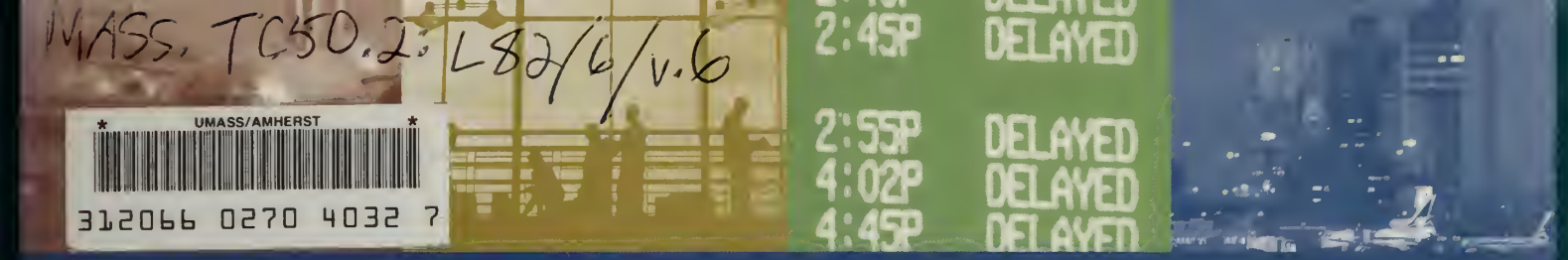
MASS. TC50.2: L82/6/v.6
UMASS/AMHERST
312066 0270 4032 7



Supplemental Draft Environmental Impact Statement/Final Environmental Impact Report

EOEA #10458

Logan Airside Improvements Planning Project



Boston Logan International Airport

massport Massachusetts Port Authority

Federal Aviation Administration

Responses to Comments
Volume 6

Supplemental Draft Environmental Impact Statement/
Final Environmental Impact Report

EOEA #10458

Logan Airside Improvements Planning Project

GOVERNMENT DOCUMENTS
COLLECTION
APR 06 2001
University of Massachusetts
Depository Copy

Boston Logan International Airport

massport Massachusetts Port Authority

Federal Aviation Administration

March 2001

Responses to Comments **Volume 6**



Printed on Recycled Paper

Table of Contents

Volume ES	Executive Summary	ES
Volume 1	Main Document	1
Volume 2	Main Document	2
Volume 3	Appendices	3
Volume 4	Responses To Comments	4
Volume 5	Responses To Comments	5
Volume 6	Responses To Comments	6
Volume 7	Responses To Comments	7
Volume 8	Responses To Comments	8
Volume 9	Responses To Comments	9
Volume 10	Responses To Comments	10
Volume 11	Responses To Comments	11


Digitized by the Internet Archive
in 2014

https://archive.org/details/loganairsideimpr06mass

Table of Contents

Letter	Commentor	Volume
Certificate		
C	Secretary's Certificate	4
Federal		
1	US Congressman Michael Capuano	4
2	US Congressman Edward J. Markey	4
3	US Congressman J. Joseph Moakley	4
4	Department of Commerce, Susan B. Fruchter	4
5	US Department of the Interior, Willie R. Taylor	4
6	USEPA, John P. DeVillars	4
7	USDOT, Bruce Young Candelaria	4
State		
8	MA Aeronautics Commission, Steve Muench	4
9	MA DEP NE Region, John Felix	4
10	MA DFW, NHESP, Hanni Dinkeloo	4
11	MA State Senator Thomas F. Birmingham	4
12	Cape Cod Legislative Delegation, Senator Henri S. Rauschenbauch	4
13	MA State Representative Robert A. DeLeo	4
14	MA State Representative Paul C. Demakis	4
15	MA State Representative Christopher G. Fallon	4
16	MA State Representative Kevin Fitzgerald	4
17	MA State Representative Patricia Jehlen	4
18	MA State Senator Stephen F. Lynch	4
19	MA State Representative Liz Malia	4
20	MA State Senator Michael W. Morrisey	4
21	MA State Senator Therese Murray	4
22	MA State Representative Eugene L. O'Flaherty	4
23	MA State Representative Anthony Petruccelli	4
24	MA State Senator Henri S. Rauschenbach	4
25	MA State Representative Byron Rushing	4
26	MA State Representative Joseph C. Sullivan	4
27	MA State Representative Timothy J. Toomey	4
28	MA State Senator Robert E. Travaglini	4
29	MA State Senator Eric T. Turkington	4

Letter	Commentor	Volume
30	Maine DOT, Ronald L. Roy, Dir., Office of Passenger Transportation	4
31	VAOT, Gregory Maguire	4
Regional		
32	Barnstable County Commissioners, Christine Dolen, Chairman	4
33	Cape Cod Commission, Herbert Olsen, Chairman	4
34	CCC, Transp. Committee, Kenneth Brock, Chair	4
35	MAPC David C. Soule, Executive Director	4
Communities		
36	Boston Mayor Thomas M. Menino	4
37	Boston Mayor Thomas M. Menino	4
38	Boston City Councillor, Charles Yancey	4
39	Boston City Councillor, Paul J. Scapicchio	4
40	Barnstable Municipal Airport Commission, Katherine Stronjy, Chair	4
41	Cambridge City Council, D. Margaret Drury, Clerk	4
42	City of Cambridge, Robert W. Healy, City Manager	4
43	City of Chelsea, Guy A. Santagate, City Manager	4
44	City of Chelsea, Preston G. Galarneau, Jr, City Councillor	4
45	City of Chelsea, Chelsea City Council, Marilyn Portnoy	4
46	City of Chelsea, Chelsea City Council, Rochelle A. Bennett	4
47	City of Everett, David Ragucci	4
48	Town of Hingham, Office of Selectmen, Michael P. Holden	4
49	Town of Hull, Philip E. Lemnios, Town Manager	4
50	Town of Hull, Planning Board, David P. Carlon, Chairman	4
51	Town & County of Nantucket, Board of Selectman, Arthur L. Desrocher	4
52	Town of Orleans, Beverly G. Singleton, Chairman	4
53	Town of Provincetown, Keith A. Bergman, Town Manager	4
54	Town of Provincetown, Municipal Airport Commission, Leonard Alberts	4
55	City of Quincy, City Council, Bruce Ayers	5
56	City of Revere, Dept. of Planning & Comm. Development, Frank Stringi	5
57	City of Revere, Revere City Council, John J. Henry, City Clerk	5
58	City of Somerville, William Roche, Acting Mayor	5
59	City of Somerville, Board of Alderman, William A. White, Jr.	5
60	City of Somerville, City Clerks Office, Arthur B. McCue, City Clerk	5
61	Winthrop Board of Selectman, Robert L. Driscoll, Jr.	5
62	Winthrop Noise Air Pollution & Airport Hazard Comm., Jerome Falbo	5
63	Winthrop Noise Air Pollution & Airport Hazard Comm., Jerome Falbo	5

Letter	Commentor	Volume
Interest Groups		
64	Aircraft Owners & Pilots Association, Dennis Roberts	5
65	Airport Impact Relief, Inc. (McGowan, Engel, etc.)	5
66	Airport Impact Relief, Inc. (McGowan, Engel, etc.)	5
67	Air Transport Assoc. of America, Scott Godfrey, Dir. Eastern Region	5
68	Air Transport Assoc. of America, Scott Godfrey, Dir. Eastern Region	5
69	Alliance of Boston Neighborhoods (Shirley Kressel)	5
70	American Airlines, Ed Freni, General Manager (Boston)	5
71	Back Bay Photo Imaging, Ray Molinaro (Boston)	5
72	Beacon Hill Civic Association, Sandra C. Steele, President	5
73	Beachmont Neighborhood Association (Debbie McHatton)	5
74	Bear, Stearns & Co. Inc.,John W. Gillespie, Managing Director	5
75	Gr. Boston Convention & Visitors Bureau, Patrick B. Moscaritolo, Pres & CEO	5
76	Boston Harbor Islands Advisory Council, Philip E. Lemnios, Member	5
77	British Airways, Gail Visentin, Dir. Passenger & Cargo Operations	5
78	Building & Construction Trades Council Metropolitan District, Joseph W. Nirgo, Jr	5
79	Cape Air/Nantucket Airlines, Daniel A. Wolf, President, Cape Air, Testimony (Hyannis)	5
80	Cape Air/Nantucket Airlines, Alfred Testa, Jr., Airport Director	5
81	Cape Cod Chamber of Commerce, John O'Brien, Chief Exec. Officer	5
82	Cape Cod Economic Development Council, Daniel Dray, Administrator	5
83	Charlestown Business Association, Carol Bratley, Chair	5
84	Chelsea Waterfront Association, Jeffrey Buck, President	5
85	Community Advisory Committee, Anastasia Lyman, Co-Chair	5
86	Community Advisory Committee, Anastasia Lyman, Co-Chair	5
87	CAC Technical Consultant, Arthur Hartnet	5
88	CAC Roxbury Rep., Dovi Abbey	5
89	CAC Roslindale/HP Rep., Alex Geourntas	5
90	CAC Braintree Rep., Sandra Kunz	5
91	CAC Quincy Rep., Bernice Mader	5
92	CAC Cambridge Rep., Kurt H. Walter	5
93	CAC Dorchester Rep., Pamela Smith	5
94	CAC Malden Rep., John Mahoney	5
95	CAC Rep, Hingham, Richard Goldhammer	5
96	CAC Melrose Rep., Joseph Gulino	6
97	CAC Revere Rep., Deborah A. Santiano-McHatton	6
98	Conservation Law Foundation, Stephen H. Burrington, Gen. Counsel	6
99	Louis A. Mandarini, Jr., Union Local 22	6
100	Continental Airlines Inc., Glen Morse, Senior Director, Industry Affiars	6

Letter	Commentor	Volume
101	Delta Airlines, John Boatright, Vice President, Properties and Facilities	6
102	Delta Airlines, David Bushy, Vice President, Flight Operations	6
103	East Boston Eagle Hill Association, Debra L. Cave, President	6
104	East Boston Eagle Hill Association, Debra L. Cave, President	6
105	East Boston Land Use Advisory Council, Robert F. Strelitz	6
106	ELLIS Neighborhood Association, Elizabeth S. Boveroux	6
107	EMC Corporation, Richard J Egan, Chairman	6
108	Teamsters Local Union 379, Paul V. Walsh	6
109	Fidelity Investments, David Weinstein, Chief of Admin. & Govt. Affairs	6
110	Fitcorp, Gary T. Klencheski, President and CEO	6
111	The Franklin Park Coalition, Martha Karchere, President	6
112	Friends of Belle Island Marsh, Gail Miller, Chair, Conservation Committee	6
113	Greater Boston Chamber, Paul Guzzi, President and CEO	6
114	Greater Boston Chamber, Paul Guzzi, President and CEO	6
115	Gr. Gardner Chamber of Commerce, Michael F Ellis, President & CEO	6
116	Fuld & Company, Michael A. Sandman, Senior Vice President	6
117	Green Works, John T. O'Conner, President	6
118	Thomas A Kershaw, Hampshire House	6
119	Intn'l Union of Operating EngineersWilliam P. Ryan, Business Manager	6
120	Iron Workers District Council of New England, Joseph M. Quilty, Pres.	6
121	Jeffries Point Neighborhood Association, Karen M. Maddalena, Chair.	6
122	Jeffries Point Neighborhood Association, Karen M. Maddalena, Chair.	6
123	Michael J. Haroz, attorney for LaSalle Hotel Oper. Partnership, L.P.	6
124	Logan Airlines Management Council, Charles Ferrara, President	6
125	Logan Airlines Management Council, Cargo Subcommittee, Co-Chairs	6
126	Manchester Airport, Alfred Testa, Jr., Airport Director	6
127	MA Audubon Society, E. Heidi Roddis, Environmental Policy Specialist	6
128	MA Business Roundtable, Nader F. Darehshori, Chairman	6
129	MA Sierra Club, John F. Deacon, Chair, Greater Boston Group	6
130	Mass Insight, State of the State Executive Summary	6
131	MASSPIRG, Rob Sargent, Legislative Director	6
132	MJ Research, Inc., John Finney, President	6
133	Nantucket Island Chamber of Commerce, Maia Gaillard, Exec. Director	6
134	Nantucket Planning & Economic Dev. Comm., Alvin S. Topham	6
135	Natl. Assoc. of Industrial and Office Properties, David I. Begelfer, Exec. Director	6
136	National Association of Railroad Passengers, Ross B. Capon, Executive Director	6
137	Natl. Association of State Aviation ERS Officials, William E. Gehman, Chair.	6
138	Natl. Association of State Aviation ERS Officials, William E. Gehman, Chair.	6
139	Neighborhood Assoc. of the Back Bay, Inc., Peter Y. Flynn, V. Chair	6

Letter	Commentor	Volume
140	New England Council, James T. Brett, President and CEO	6
141	New England's Economy Depends on Logan, Frank Gibson / testimony	6
142	New England Guatemalan Alliance, Ignacio W. Ochoa, President	6
143	Noise Pollution Clearing House	6
144	Nuestra, CDC, John Mahoney	6
145	Pilot Block Neighborhood Association, Cynthia J. Steil, President	6
146	PRI Automation, Wendy Peters, Travel Manager	6
147	Provincetown Business Guild, Gary Reinhart, President	6
148	Provincetown AIDS Support Group, Gary Reinhart, President	6
149	Save our Heritage, c/o ADS Ventures, Inc., Chet Atkins	6
150	The Seaport Alliance (SAND), Steve Hollinger	6
151	Sherburne, Powers, Holland & Knight Law Offices, Kenneth P. Brier	6
152	Slade Gorton & Co., Inc., Wally Stevens, President	6
153	The South Boston Environmental Health Watch	6
154	Squantum Community Association, Frank Buckley, President	6
155	Swissotel, Boston, David Gibbons, General Manager	6
156	Tufts Associates, Charles K Tufts, CLU, ChFC	6
157	US Airways, Robert A Hazel, Vice President, Properties and Facilities	6
158	Winthrop Chamber of Commerce	6
Private Citizens		
Boston		
159	Duane Andrews, RN	7
160	John Archibald	7
161	David A. Banta & Caroline E. Coggeshall	7
162	David Bartol	7
163	Claudia Brede	7
164	Jon Burk	7
165	Barry B. Corden	7
166	Michael Dukakis, Northeastern University, Dept. Of Political Science	7
167	Irv Englander	7
168	Brian Gallagher	7
169	South End Resident - Nina Garfinkle	7
170	S. Kay Gibbs	7
171	Sterling Giles	7
172	Robert and Kathleen Hathaway	7
173	Ann Hershfang	7
174	Ann Hershfang	7
175	Christine A. O'Toole	7

Letter	Commentor	Volume
176	Darryl Pomicter	7
177	Beverly Sky	7
178	John Stewart	7
179	Vincent R. Tino	7
180	Mark C. Warren, Esq.	7
181	Barbara A. White	7
182	Robert Wynne	7
183	Edwina Yezierski	7
184	Edwina Yezierski	7
185	V.Ferne	7
186	Marine Cotton	7
186	John P. Kilroy, Jr.	7
186	John O'Connor	7
186	Melissa Sciter	7
Brookline		
187	Mona Thaler	7
Cambridge		
188	Debra Biba and Rob Everts	7
189	Brian Culver	7
190	John G. McKernan	7
191	Ann Rodney	7
192	Fred Salvucci, MIT, Department of Civil Environmental Engineering	7
193	Fred Salvucci, MIT, Department of Civil Environmental Engineering	7
194	Margaret Webster	7
Charlestown		
195	Arthur Krolman, CFA, President, Krolman Corporation	7
Chelsea		
196	Elizabeth A. Aberg	7
197	Peter Alachi	7
198	Monika M. Corneille	7
199	Monika M. Corneille	7
200	Louis P. DiSano	7
201	Charlie Ferguson, Soldiers' Home	7
202	Charlie Ferguson, Soldiers' Home	7
203	Patricia Grasso	7

Letter	Commentor	Volume
204	Joseph S. Kowalcczyk	7
205	Joseph S. Kowalcczyk	7
206	Lungren Management Group, Inc.	7
207	Elaine McGrath	7
208	Robert D. Morgese	7
209	"Moses"	7
210	"Moses"	7
211	Mary Jane Quinn	7
212	Mary Jane Quinn	7
213	Mary Quinn	7
Cohasset		
214	Martha Gjestby	7
Dorchester		
215	Michael P. County	7
216	Barbara McDonough	7
217	Karen L. Rucker	7
East Boston		
218	Carolyn and Brent Banulis	7
219	Mary C. Berninger	7
220	Christopher Blackler	7
221	Catherine Brayden	7
222	Charles I. Cann, III	7
223	Mrs Carmela D'Amore	7
224	Miss Edith G. DeAngelis	7
225	Robert A. DeMayo	7
226	Mary Dreitlein	7
227	Mary Dreitlein	7
228	Charles & Ann Dulcetta	7
229	Robert Fleming	7
230	Ethan D. Hoag	7
231	M Blossom Hoag	7
232	Roberta T. Horn	7
233	Susan M. Horn	8
234	Craig and Linda Jolliffe	8
235	Dr. and Mrs. Gilbert R. Lavoie	8
236	Richard C. Lynds, Esq.	8

Letter	Commentor	Volume
237	William J. Manning	8
238	William Manning	8
239	Regina M. Marchi	8
240	Regina M. Marchi	8
241	Elizabeth Mazzarini	8
242	Jim McBride	8
243	Francis McHugh	8
244	Christopher J. Morton	8
245	Jean Riesman	8
246	Richard Salini	8
247	Mark W. Stettler & Cathryn C. Stettler	8
248	Mark W. Stettler	8
249	Charlene Stevens	8
250	Lauri Webster	8
251	Mary Ellen Welch	8
Everett		
252	Olympia Mastrocola	8
Hingham		
253	Dr. and Mrs. Robert F. Belknap	8
254	Robert F. Belknap MD	8
255	Charles & Susan Berry	8
256	James B. Conroy	8
257	Lynn Conroy	8
258	Edward H. D'Alelio	8
259	Albert J. Engelhart	8
260	Robert R. Green	8
261	Harold & Lorraine Lincoln	8
262	Adrienne F. Richardson	8
263	John E. Richardson	8
264	Elliott Schiffman	8
265	Stephen K. Thress	8
266	Bradford S. Tripp and Jane L. Tripp	8
267	Catherine Goldhammer	8
267	Alice Granahan	8
267	Mary Furlong	8
267	Mike Furlong	8
267	Bridget Marganelli	8
267	John Tardif	8

Letter	Commentor	Volume
267	William Falcetano	8
268	James T. Norris	8
268	Doris M. Hogan	8
Hull		
268	Kathleen Fitzgerald	8
269	Nancy Brayton	8
270	Madeleine Carlson	8
271	Corinne Case	8
272	Lory Newmyer & Steve Cooper	8
273	Pauline DePari	8
274	David Foss	8
275	Frank and Eileen Furey	8
276	Diana Goode	8
277	Mark P. Ingaciola	8
278	Marjorie Rilleau Kallman	8
279	Stephen Lathrop	8
280	Daniel and Jacqueline Llewellyn	8
281	Dr. Jo Loughnane	8
282	Jeannette MacDonald	8
283	James McCaffery	8
284	Kimberly Iris Mills	8
285	William M. Reid	8
286	Robert Ridolfi	8
287	JD Russell	8
288	Ann M. Rogers	8
289	Lisa J. Scannell	8
290	Franklyn & Barbara Schafer	8
291	Sean Shanahan	8
292	Gerard J. Sperry, Sperry Group	8
293	E. Vincent Sullivan	8
294	Geraldine M. Townsend	8
295	William E. Townsend	8
296	William A. Weiser	8
297	Robert Carney & Wanda Willard	8
298	Anonymous	8

Letter	Commentor	Volume
Hyannis		
299	Robert and Katherine Strojny	8
Jamaica Plain		
300	Cheryl Balukonis	8
301	Daniel L. Barnett	8
302	Sarah Buchmann	8
303	Constance R. Cecil	8
304	Peter Clarke	8
305	Nancy Doherty	8
306	Jack Dolan	8
307	Marty Epp	8
308	Marty (Martha) Epp & Judy K. Mencher	8
309	Donald H. Eunson	8
310	Magdalena Fernandez	8
311	Gerard M. Finch	8
312	Jacqueline Gambarini	8
313	Thomas Harrigan	8
314	Eleanor Horner	8
315	Arthur L. Johnson	8
316	Barbara Kaplan	8
317	Barbara Kaplan	8
318	Barbara Kaplan	8
319	Lisa Lederer	8
320	Mike Lew	8
321	Sal Lopes	8
322	Myra N. Love	8
323	Will Lyman	8
324	Mr. and Mrs. Joseph M. Nucci	8
325	Martha Merson	8
326	Laura Orlando	8
327	Emily Peckham	8
328	Anne Rogers	8
329	James P. Sliker	8
330	Lynn Thornton	8
331	Danielle Toth	8
332	Danielle Toth	8
333	David Weinstein	8
334	David Weinstein	8
335	Jacques Weissgerber	8

Letter	Commentor	Volume
Newton		
336	T. Brown	8
Medford		
337	Richard Jordan	8
338	Jill Richard	8
Quincy		
339	Maryann P. Mahony	8
340	Marie and James Stamos	8
Revere		
341	Ivan and Nancy Blecher	8
342	Lynn Mazzaullo	8
Roslindale		
343	Matthew S. Baronas	8
344	Natalie Diffloth	8
345	Sal Lopes	8
346	Stephanie Moura & Kate Keeler	8
347	Mary A. Moynihan	8
348	Sheryl L. White	8
349	Alan Wright	8
Roxbury		
350	Todd L. Payton	8
Somerville		
351	Ellen G. Band	9
352	Dick Bauer	9
353	Ramon Bueno & Debra Weisberg	9
354	Jack Christin, Jr.	9
355	Derek C. Dyer	9
356	Anthony W. Espy	9
357	Tilghman Evans	9
358	William Falcetano	9
359	William Falcetano	9
360	Irving Fischman, Ph.D.	9
361	Al Fisher	9

Letter	Commentor	Volume
362	Tad Flynn	9
363	Angela Healy	9
364	Suzan Kelly	9
365	Carol Kiley	9
366	Mo Lotman	9
367	Alice Atwood Mahoney	9
368	Panamai Manadee	9
369	Beth Manaster	9
370	Michael Mercandante	9
371	Elizabeth & Brian Merrick	9
372	M. Grazia Marzot	9
373	Cecil L. Nickerson	9
374	Lynn Palmer	9
375	Lawrence Paolella	9
376	Carol Rego	9
377	Margaret Sanfilippo	9
378	Jane Sauer	9
379	Amanda Sawires	9
380	Marguerite Scott	9
381	Jerry Shine	9
382	Deirdre Smith	9
383	Allison Stieber	9
384	Susan Strauss & June Owen	9
385	Daniel Toner	9
386	Carla Wilbur	9
387	Lawrence A. Yager	9
West Roxbury		
388	Joanne McGrath	9
389	Andrea Taaffe	9
Weymouth		
390	Ronald A. Fama	9
Winchester		
391	Michele LaMura	9

Letter	Commentor	Volume
Winthrop		
392	Barbara Bishop	9
393	Nancy J Crombie	9
394	Gregory DePatto	9
395	Richard D. Gill	9
396	Edward Lowney	9
397	Eleanora Olivolo	9
398	Anita L. Martin	9
399	Thomas J. McCarthy, McCarthy, Allegretto & McCarthy Attors.at Law	9
400	Thomas A. McNiff, Jr.	9
401	Helen Murray	9
402	Alicia A. Stoddard	9
403	Ron Wayland	9
404	Judith and John Silck	9
404	Carmen S Domenico	9
404	John and Barbara Domenico	9
Miscellaneous		
405	Sharon Fisher to MEPA	9
406	Heather Hughes	9
407	Kimberly _____- Unknown Resident	9
408	Unknown Hull Resident to MEPA	9
409	Unknown Commentor	9
410	Unknown Resident	9
411	Ellen Winkler	9
411	Brock Philips	9
411	David Prusky	9
411	L. Gertrude Honan	9
411	Barbara Bishop,	9
411	George McLaughlin	9
411	Rebecca Swope	9
411	Henry Carson	9
412	Jeff Miller, Boston Marriot Long Wharf	9
412	Bill Skoglund, General Manager, Boston Marriot Newton	9
412	Paul V. Puzzanghero, General Manager, Peabody Marriot	9
412	Terry Wordon, General Manager, and Boston Marriot Copley Place	9
412	Bill Munck, General Manager	9

Letter	Commentor	Volume
Transcripts 1		
State		
T1.03.1	MA Aeronautics Commission, Steve Muench	10
T1.01.1	MA State Representative Bruce Ayers	10
T1.23.1	MA State Representative Liz Malia	10
Communities		
T1.05.1	City of Boston Environmental Services, Andrea D'Amato	10
T1.07.1	Town of Hull, Philip E. Lemnios, Town Manager	10
T1.06.1	City of Somerville, Thomas Fontacella	10
T1.02.1	Winthrop Board of Selectman, Robert L. Driscoll, Jr.	10
Interest Groups		
T1.09.1	Aero Club of New England, David W. Graham	10
T1.19.1	Aircraft Owners and Pilots Association, Raoul Murrow	10
T1.29.1	Airport Impact Relief, Inc., Peter Koff	10
T1.36.1	Beacon Hill Civic Association, Darryl Pomicter	10
T1.08.1	CAC Quincy Rep., Bernice Mader	10
T1.37.1	CAC Melrose Rep., Joseph Gulino	10
T1.39.1	CAC Quincy Rep. Bill Galvin	10
T1.40.1	CAC Roxbury Rep., Dovi Abbey	10
T1.24.1	Cape Air/Nantucket Airlines, Daniel A. Wolf, President, Cape Air	10
T1.30.1	Cape Air/Nantucket Airlines, Charles Carrera	10
T1.04.1	Gr. Boston Chamber, Paul Guzzi, President & Chief Executive Officer	10
T1.21.1	Thomas A Kershaw, Hampshire House	10
T1.31.1	Logan Airlines Management Council, Enrique Miranda	10
T1.11.1	Massachusetts Business Round Table, Christopher Good	10
T1.13.1	Massachusetts High Technology Council, Christopher Anderson	10
T1.26.1	New England's Economy Depends on Logan, Frank Gibson	10
T1.17.1	South Shore Chamber of Commerce, Kevin Cohen	10
Private Citizens (alphabetical by last name)		
T1.12.1	Christopher Blackler	10
T1.28.1	Candace Collins Boden	10
T1.38.1	Roland Choquet	10
T1.35.1	Albert J. Engelhart	10
T1.22.1	Phil Falcetano	10
T1.34.1	Richard Goldhammer	10
T1.14.1	Arthur Hartnet	10
T1.32.1	Arthur Krolman	10
T1.15.1	Arthur D. Little, Albert Sherman	10

Letter	Commentor	Volume
T1.18.1	Elaine McGrath	10
T1.10.1	David Osborn	10
T1.41.1	Todd L. Payton	10
T1.20.1	Mary Quinn	10
T1.27.1	Christine Silverstein	10
T1.25.1	Allison Stieber	10
T1.16.1	Ron Whalen	10
T1.33.1	Alan Wright	10
Transcripts 2		
Federal		
T2.04.1	US Congressman Michael Capuano	11
State		
T2.01.1	MA Aeronautics Commission, Sherman Saltmarsh	11
Communities		
T2.09.1	City of Chelsea, Juan Vega, City Council President	11
T2.10.1	City of Chelsea, Chelsea City Council, Rochelle A. Bennett	11
T2.05.1	City of Chelsea, Paul Nowicki, City Councillor	11
T2.02.1	City of Somerville, Bob Haas, Mayor	11
T2.07.1	Winthrop Board of Selectman, Jerry Ogus, Chair	11
T2.16.1	Winthrop Noise Air Pollution & Airport Hazard Committee, Bob Driscoll, Sr., Vice- Chair	11
T2.06.1	Winthrop Airport Hazards Committee, Jerome E. Falbo	11
Interest Groups		
T2.23.1	Air Transport Association of America, Scott Godfrey, Dir E. Region	11
T2.19.1	American Airlines, Ed Freni, General Manager	11
T2.15.1	British Airways, Gail Visentin, Dir. Passenger & Cargo Operations	11
T2.18.1	CARE, Rick Rodes, President	11
T2.28.1	CARE, John O'Connor	11
T2.13.1	Continental Airlines Inc., Glen Morse, Sr. Director, Industry Affairs	11
T2.22.1	Community Advisory Committee, Ronald Taylor	11
T2.26.1	East Boston Land Use Advisory Council, Joe Palenza, Chairperson	11
T2.11.1	Gr. Boston Chamber, Jim Kloche, Dir. of Economic Development	11
T2.27.1	Jeffries Pt. Neighborhood Assoc., Karen M. Maddalena, Chairperson	11
T2.21.1	United Airlines, Sean Donohue, City Manager	11
T2.17.1	US Airways, Robert A Hazel, General Manager	11
Private Citizens (alphabetical by last name)		
T2.38.1	Hugo Ascolillo	11
T2.30.1	Mary Beringer	11

Letter	Commentor	Volume
T2.33.1	Stephen Brown	11
T2.12.1	Kathy Callahan	11
T2.60.1	Roland Choquet	11
T2.45.1	Gregory Curci	11
T2.41.1	Anthony DiBennedetto	11
T2.20.1	Richard Dimes	11
T2.35.1	Art Flavin	11
T2.03.01	Preston Galarneau	11
T2.32.1	Tony Gambale	11
T2.57.1	Arthur Hartnet	11
T2.54.1	Michael Herbert	11
T2.52.1	Blossom Hoag	11
T2.40.1	Roberta Horn	11
T2.46.1	Linda Jolliffe	11
T2.51.1	Martin Kaufman	11
T1.15.1	Arthur D. Little, Albert Sherman	11
T2.29.1	Richard C. Lynds	11
T2.49.1	Kathleen McAuley	11
T2.39.1	Thomas McCarthy	11
T2.43.1	Debbie Santiano-McHatton	11
T2.58.1	Gail Miller	11
T2.36.1	Fred Moore	11
T2.34.1	Anthony Nester	11
T2.08.1	John Nucci	11
T2.37.1	Anthony Petrucelli	11
T2.47.1	Barry Powers	11
T2.55.1	Susan Powers	11
T2.56.1	Mary Quinn	11
T2.50.1	Fran Riley	11
T2.59.1	Fran Riley	11
T2.42.1	David Rudolph	11
T2.25.1	Richard Salini	11
T2.48.1	Pamela Smith	11
T2.61.1	Jim Stamos	11
T2.24.1	Steve Stoddard	11
T2.44.1	Bob Strelitz	11
T2.14.1	John Tardif	11
T2.53.1	Albert Van Buskirk	11
T2.31.1	Mary Ellen Welsh	11

Acronyms

Airside Project	Logan Airside Improvements Planning Project
CAA	Clean Air Act
dB	decibel
DEP	Massachusetts Department of Environmental Protection
DOT	Department of Transportation
Draft EIS/EIR	Draft Environmental Impact Statement/Environmental Impact Report
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ENF	Environmental Notification Form
EOEA	Executive Office of Environmental Affairs
EPA	Environmental Protection Agency
ESPR	Environmental Status and Progress Report
FAA	Federal Aviation Administration
FONSI	Finding of No Significant Impact
GEIR	Generic Environmental Impact Report
ILS	Instrument Landing Systems
INM	Integrated Noise Model
Logan Airport	Boston-Logan International Airport
Massport	Massachusetts Port Authority
MBTA	Massachusetts Bay Transportation Authority
MEPA	Massachusetts Environmental Policy Act
MESA	Massachusetts Endangered Species Act
MassHighway	Massachusetts Highway Department
MOU	Memorandum of Understanding
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OPSNET	FAA Air Traffic Operations Network
PM_{10}	particulate matter less than 10 microns in size
PPP	Peak Period Pricing
PRAS	Preferential Runway Advisory System
ROD	Record of Decision
SDEIS Panel	Supplemental Draft EIS Panel
Supplemental DEIS/ FEIR	Supplemental Draft Environmental Impact Statement/Final Environmental Impact Report
VFR	Visual Flight Rules
VOC	volatile organic compounds
29M Low Fleet	29 Million annual air passenger Low Fleet
37.5M High Fleet	37.5 Million annual air passenger High Fleet

Joseph S. Gulino
Melrose Representative to the Logan CAC

LETTER 96

25 Apple Hill Road
Melrose, MA 02176

April 20, 1999

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Arthur Pugsley, EOEA No. 10458
100 Cambridge Street - 20th Floor
Boston, MA 02025

Dear Secretary Durand:

I am writing to ask you for your help in opposing Massports expansion plans for Logan Airport.

It is my feeling that given Massports increased air traffic projections, that this new runway does not begin to address delays at Logan Airport.

Massport is projecting an increase in flight operations from the current 500,000 per year to 750,000 per year. Yet this new runway is projected to handle only 75,000 flights per year. Where will the other 175,000 planes go, and how will existing delays improve under this scenario? By the time this new runway would be operational, any temporary relief would be marginal at best.

Massport argues that this new runway will provide relief to the communities surrounding the airport. That seems to be at odds with the opinions of the people who live in those communities.

I, too, am one who fails to see this conclusion. What I see is Massports ability to increase flight operations to a guaranteed 120 average operations per hour, from an existing average of 90 operations per hour now. This would seem to me to be an expansion plan, and not a delay reduction plan, and this would also seem to place a greater burden on the communities, not any relief.

I would argue that the burden of airport traffic should be shared by all communities that use the airport, kind of like a "pay to play" rule. By this I mean that Logan is at its capacity and by Massports estimates, 40-60% of the people who use Logan live outside of the Route 128 belt.

Logan is only 1,200 acres, and, as many Major airports go, relatively small in comparison to the newer, major 10,000 acre airports that have been built or expanded around the country.

I support Mayor Menino, Congressman Markey, Congress Capuano and other political and social leaders, as well as the the community group CARE's recommendation for a blue ribbon commission to study and strategize on our regional transportation system and to look for long term solutions to the Commonwealth's transportation needs, including the siting of a new major airport. 96.1

This would alleviate safety and environmental concerns in the immediate Metropolitan area of Boston including but not limited to reductions in air and ground transportation in the City of Boston, reductions in noise and air pollution, and an increase in quality of life issues, etc., etc..

I find it unconscionable that Massport to date has spent Millions of dollars, considers this new runway to be a delay reduction plan, and at the same time admits that they have failed to look at any long term solutions that are obviously necessary to bring our air transportation system into the 21st century. 96.2

Massport claims to be a good neighbor, and yet, as the City of Melrose representative to the CAC, I am a bit confused by this claim. I asked massport at a meeting of the Airside Review Committee (ARC), if they would come to our City to explain to our Mayor, Board of Alderman and our homeowners and taxpayers the effects of this new runway on our community. Betty Derosier, with Director Peter Blute, standing right there, said that they would. But when I called at the request of our Mayor and Board of Alderman to schedule this meeting, Massport's response was " we have reconsidered our position with respect to individual community presentations" (see attached letter).

Melrose has and continues to experience an increase in air traffic and noise, and I have come to the belief that it is expected to triple. Today, according to Massports estimates, Melrose experiences 4% of all airport traffic, which will increase to 12%. On current volume of 500,000 operations today, that is currently 20,000 flights per year increasing to 60,000 flights per year over Melrose and will increase to 90,000 flights per year when volume levels reach the expected 750,000 flights per year. Yet Massport doesn't consider Melrose to be adversely impacted. I find this outrageous and ask for your help in holding Massport accountable.

Massport's computer generated flight models do not even show a jet flying over Melrose, yet I can look up in the skies on just about any given day and I can show you many jets flying over Melrose.

Massport was very careful in documenting their public participation quota. However, it is my feeling that they shyed away from any real public participation,

as evidenced by their eagerness to push this project through in two months after a 20 month period of self imposed delay.

I share the sentiments of many that this DEIS/DEIR document is flawed in it's selection of outdated weather and flight data information, its' lack of analysis and/or inclusion of potential solutions to delay and expansion scenarios (i.e. peak period pricing and Hanscom field, etc.) and it is my opinion that it is flawed in it's conclusion that this is the answer to reducing delays and solving the Commonwealth's air transportation needs. 96.3

I urge you to join the political and social leaders, and the communities and the people who oppose this new runway and proposal, until such time as Massport updates it's data and considers and includes some long term solutions to this air transportation problem.

Boston is a World Class City, and the people and businesses of the Commonwealth deserve a World Class and Long Term solution to their air transportation needs.

Thank you very much for your help.

Very Truly Yours,

Joseph S. Gulino,
Melrose representative
to the Logan CAC

Attachment

CC:John Silva, Manager, FAA Airports Division Environmental Programs
John DeVillars, New England Regional Administrator EPA
Melrose Mayor Patrick Guerrierro
Melrose Board of Alderman
State Representative Michael Festa
State Senator Richard Tisei
Logan CAC Chair
CARE Board

Letter 96
Community Advisory Committee Representative, Melrose
Joseph S. Gulino

Code	Topic 1	Topic 2	Comment	Response
96.1	Enviromental Review Process	Blue Ribbon pANEL	I support...recommendation for a blue ribbon commission to study and strategize on our regional transportation system....	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts. As summarized in the Draft EIS/EIR, a number of studies that address regional transportation planning issues have been conducted over the last ten years. These studies have concluded that the Airside Project at Logan Airport, the expansion of the regional airports, and the implementation of high speed rail are all necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation. Chapter 2 of the Supplemental DEIS/FEIR discusses the entire region's air transportation system, along with a discussion of alternative modes, specifically high-speed rail, and describes the regional study and its major conclusions.

Code	Topic 1	Topic 2	Comment	Response
96.2	Environmental Review Process	Public Process	Concerned about openness of public participation process.	There was an extensive public participation and review process during the preparation of the Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.

Code	Topic 1	Topic 2	Comment	Response
96.3	Delay	Model	...document is flawed in its selection of outdated weather and flight data information, its lack of analysis and/or inclusion of potential solutions to delay and expansion scenarios (i.e. peak period pricing and Hanscom field, etc.)....	The Supplemental DEIS/FEIR provides updated information for 1998—the latest year for which actual Logan Airport data are available. 1993 was adopted as the base year when the Airside Improvement studies commenced in 1994. The primary function of the Base Year analysis is to calibrate the airfield operation models and environmental impact models. The benefits and impacts of the action alternatives (Alternatives 1, 1A, 2 and 3) are assessed by comparing these not with the base year, but with Alternative 4, the No-Action Alternative. The planning scenarios for 37.5 and 45 million passengers represent a range of future activity at Logan Airport expected in the 2010 to 2020 time frame. Analysis of 1981 to 90 weather with 1989-98 weather identifies no significant differences in statistical properties. The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR contain analysis of PPP as a demand management alternative at Logan Airport. PPP is not recommended for implementation at this time because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport is prepared to initiate a process, as described in Section 4.5.4 of the Supplemental DEIS/FEIR, to initiate the rule-making process to implement PPP at that time. The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.

Deborah A. Santiano-McHatton
89 Leverett Ave
Beachmont, MA 02151

LETTER 97

April 19th,1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02202

RE: Draft EIR logan Airside Improvements - EOEA #10458

Dear Mr. Pugsley:

For over two years as Revere's alternate CAC, I have attended CAC meetings, reviewed the draft EIR, and attended several Massport Presentations to various neighborhoods. I feel that the proposed Logan Airside Improvements are unfair to the "close-in" neighborhoods and that the "improvements" offer no serious long term relief to the impacted neighborhoods. I also believe that the main thrust of the "improvements" is not to reduce delays, but to optimize the capacity of Logan so more flights may be accomodated.

1. Reduction of the Decision Point Minimum

We are opposed to the lowering of the decision point minimum on runway 22L. To quote from the draft EIS/EIR: "If the reported visibility at the airport is less than the published minima for the approach, the pilot must wait until the weather improves, use another runway or divert to another airport."[1] Reducing the minimum will allow more planes to land in inclement weather. This will mean more planes on runway 4/22 during bad weather and would allow an operating gain of 94 hours to Massport. At 35 planes landing an hour, Revere would have an increase of approximately 3200 operations. The Beachmont hill in Revere is 120 feet with a 50 foot building on top. Planes are flying at less than 500 feet at this point over our homes and they are less than 300 feet over the elderly housing. 97.1

In Massports presentation at the VFW in Beachmont Massport explains how the lowering of the minimum will benefit Revere by changing the decision point closer to the airport. This brings the decision point over East Boston. In Massports presentation at the Orient Heights Yacht Club the slide showing the decision point was omitted. Was this because it does not benefit the Orient Heights neighbors?

I ask that you find the Draft inadequate in this matter, especially since the subject did not appear in volume one. Most people did not even review this as they did not receive volume 3 technical appendix in which this subject is referenced. The document also does not indicate that a 50 foot building is atop Beachmont Hill and implies a false perspective.

---

[1]Logan Airside Improvements Planning Project. Volume 3 p.1 "overview"

2. Runway 14/32

Runway 14/32 has been presented to the community as a way of reducing delay for Massport. It is also purported to distribute operations more evenly amongst neighboring communities. The new runway will allow Massport to operate in high Northwest winds. This does not affect operations on 4/22 which cannot be used in this weather. So there is no relief to us in high Northeast winds with 14/32 operating. With mild weather conditions 14/32 could possibly provide some relief to our community. However with Massports growth projections, our neighborhood will return to the same intolerable level in just a few years. 97.2

3. Proposed Centerfield Taxiway

The new centerfield taxiway will make runways 4/22 more attractive to use. This would offset the purpose of sharing the burden of operations with other communities. PRAS goals have not been met in the past and this "improvement" will certainly not provide relief to Revere, East Boston, or Winthrop. 97.3

4. Noise

The Draft EIR addresses noise with updating aircraft's to Stage Three. Currently 85% of operation at Logan are Stage Three and all late night operation are restricted to Stage Three. Stage three is still a very noisy aircraft, loud enough to wake you up at 3AM. Therefore Stage Three is inadequate in resolving noise pollution. It should be mandated that all aircraft be no louder than 65 decibels. 97.4

The Draft EIR does not provide any long term solution to Massports propensity to grow, nor does it address the consequences to the impacted communities, the injustice to the "close-in" communities. 97.5

I am a life-long resident of Beachmont , the most highly impacted area of Revere, living within the 70 to often well above 85 decibel noise contour from Logan. Sound -proofing is not suitable mitigation for the environmental injustice inflicted upon us. We need strict night time curfews, effective from 10PM to 7AM. An operational cap should be implemented at Logan. With limited land size, hasn't Logan really reached it's capacity? Sound-proofing should be expanded to include central air-conditioning. Trees should be planted to absorb some of the noise. Noise and air pollution monitors (such as those requested by our community and not received) should be made available to all impacted neighborhoods. 97.6

Logan as it exist today is here to stay. With its own projection for growth, and subsequent noise, our neighborhoods will be extinct in the future.

The Draft EIR fails to look seriously at a second major Airport, which would be the only real solution for impacted communities. 97.7

Respectfully,

Deborah A. Santiano-McHatton

Deborah A. Santiano-McHatton

Letter 97
Community Advisory Committee Representative, Revere Alternate Deborah A. Santiano-McHatton

Code	Topic 1	Topic 2	Comment	Response
97.1	Alternative	Reduced Approach Minima	We are opposed to the lowering of the decision point minimum on runway 22L...This will mean more planes on runway 4/22 during bad weather....	Reducing the current landing minimums for Runways 15R, 22L, and 27 at Logan Airport does not equate to a reduction in the existing levels of safety. Aircraft would follow the same arrival paths, at the same altitudes as today, but the location at which a missed approach procedure would be initiated would be moved closer to the airport. Ideally, whenever possible, the lowest minimums are used to ensure the greatest availability of a runway during poor weather. Although normally categorically excluded from the NEPA review, the Airside Project study included modeling of changes in runway availability due to reductions in the approach minimums and an analysis of the potential impacts on community noise exposure that may result. Appendix D indicates a 0.1 percent increase in equivalent jet arrivals on Runway 22 and no increase in equivalent jet departures on Runway 4 with the 37.5M High Fleet and Reduced Minimums.
97.2	Noise	Runway 14/32	...there is no relief to us in high Northeast winds with 14/32 operating. With mild weather conditions 14/32 could possibly provide some relief to our community.	In high northeast winds, Runway 4R is the primary runway. However, in milder northeast winds, Runway 14/32 would provide some relief.
97.3	Alternatives	Taxiway Improvements	The new centerfield taxiway will make runways 4/22 more attractive to use...this 'improvement' will certainly not provide relief to Revere, East Boston, or Winthrop.	The taxiway improvements are designed to improve ground movement efficiency and safety, and to reduce taxiing delays; thereby reducing associated noise and emissions. When using Runways 22L/R for departures, the Centerfield Taxiway would provide an alternate taxi route for Runway 22L departures to bypass the queue for Runway 22R, thereby reducing taxiway congestion and associated noise and emissions. Runway 22L departures represent less than ten percent of the total departures. Under existing conditions, aircraft needing to depart on Runway 22L (typically heavy jets, such as 747s with long takeoff distance requirements) must wait in the queue on Taxiway November with aircraft departing on Runway 22R. With the Centerfield Taxiway, aircraft departing on Runway 22L could depart quickly after reaching the runway end, and the number of aircraft queuing on Taxiway November should decline. Also, the aircraft on the Taxiway November should be smaller, implying lower noise and air quality emissions. With the addition of Runway 14/32, use of Runways 22R and 22L for departures would decline.
97.4	Noise	Hushkitted Aircraft	Therefore Stage Three is inadequate in resolving noise pollution. It should be mandated that all aircraft be no louder than 65 decibels.	Stage 3 is not the final answer to aircraft noise. However, the retirement of hushkitted Stage 3 aircraft, the continued development of quieter aircraft, and the ongoing research for quieter future aircraft offer significant hope for the future. However, a noise limit of 65 dBA, which is well below the federal limits for automobiles and trucks, is not appropriate for aircraft.

Code	Topic 1	Topic 2	Comment	Response
97.5	Environmental Justice	Impacts	...[The Draft EIR does not] address the consequences to the impacted communities, the injustice to the 'close-in' communities.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.
97.6	Noise	Sound Insulation	Sound-proofing is not suitable mitigation for the environmental injustice inflicted upon us.	Sound insulation does not totally mitigate aircraft noise. However, it reduces the noise inside the dwelling unit to improve the indoors environment and reduce the impact on indoor human activities, such as speech communication and sleeping. While the implementation of the Preferred Alternative would bring additional homes within the criteria for inclusion in the sound insulation program, the inside of these homes will have lower noise levels than they would have had without sound insulation under the No Action Alternative.
97.7	Regional Transportation	Regional Airports	The Draft EIR fails to look seriously at a second major Airport....	Comment noted.

CLF Conservation Law Foundation

LETTER 98

April 23. 1999

✓Robert Durand
Secretary of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, MA 02202
Attention: MEPA Office (Arthur Pugsley)

John C. Silva
Manager, Environmental Programs
Airports Division, ANE-600
New England Region
Federal Aviation Administration
12 New England Executive Park
Burlington, MA 01803

Re: Logan Airside Improvements Planning Project
Draft Environmental Impact Statement/Report, EOEA #10458

Gentlemen:

Enclosed for filing please find the Comments of the Conservation Law Foundation on the Logan Airside Improvements Planning Project Draft Environmental Impact Statement/Report submitted by the Massachusetts Port Authority. CLF urges the Massachusetts Secretary of Environmental Affairs and the Administrator of the Federal Aviation Administration to find that the DEIS/R is inadequate, and to require that Massport prepare a Supplemental DEIS/R.

While an extremely valuable asset for Boston and the region, Logan Airport has serious environmental impacts, ranging from the noise impacts of planes to the motor vehicle air pollution attributable to the airport, New England's largest generator of motor vehicle trips. CLF is very skeptical of the need for either expanded runway capacity at Logan or a new regional airport, either to reduce delays or accommodate passenger growth. The sought-after benefits of such facilities can be obtained through less environmentally harmful means: namely, if Logan operated more efficiently (through "peak hour pricing" or other runway pricing reforms) and better use was made of intercity

rail service as well as other regional airports which travelers could reach by environmentally responsible modes of transportation, including rail.

Massport was tasked with analyzing in the DEIS/R whether these measures could be alternative means for addressing flight delays at Logan. Unfortunately, Massport did an inadequate job of performing this analysis. Accordingly, Massport has failed to make its case that the proposed "airside improvements," of which Runway 14/32 is the most prominent example, are the least environmentally damaging way to address the delay question which Massport is ostensibly addressing. If Massport continues to seek to build this runway, it must next, in a Supplemental DEIS/R, fairly and thoroughly assess these important alternative measures.

Massport's failure adequately to consider administrative measures like peak-hour pricing and the potential of rail and other airports as alternative ways of addressing Logan's flight delays is related to a larger and more serious problem: the absence of a regional strategy for dealing with Massport's ominous growth projections for Logan. Massport estimates that, whether or not the proposed runway is built, Logan's present level of 26.5 million passengers per year will grow to between 37.5 and 45 million passengers by 2010. A major regional planning initiative is needed right now -- before additional capacity is provided at Logan -- to address how to plan for this projected demand in the most efficient and environmentally sensitive way possible. While outside the scope of MEPA or FAA formal review, CLF urges Massport and appropriate state agencies in Massachusetts to initiate a planning process, in partnership with officials from Rhode Island and New Hampshire and with other stakeholders from around the region, to develop a workable, sustainable strategy for handling inter-city travel demand in the region. The plan would address both goals for use of rail service and other airports and specific strategies for attaining those goals.

Very truly yours,

Stephen H. Burrington
General Counsel

Bennet Heart
Senior Attorney

Seth L. Kaplan
Staff Attorney

cc: Massport

COMMENTS OF THE CONSERVATION LAW FOUNDATION ON THE LOGAN AIRSIDE IMPROVEMENTS PLANNING PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT

EOEA No. 10458

April 23, 1999

Submitted by Seth L. Kaplan, Bennet Heart, and Stephen H. Burrington

I. Introduction

The Conservation Law Foundation (CLF), a member-supported, non-profit environmental advocacy organization founded in 1966, has been involved with Logan International Airport related issues for many years. CLF's mission is to work to solve the environmental problems that threaten the people, natural resources, and communities of New England, and the plans and actions of the Massachusetts Port Authority (Massport) at Logan Airport have regularly warranted our attention. Historically, when the subject of meeting increasing demand for air travel in the region has come up, one of two options are put on the table: Logan cannot grow to accommodate projected demand, so we need to build a "second airport" (in a location with no transit/rail access) or Logan needs to grow even if it is at the expense of neighboring communities. CLF has rejected both positions. Several years ago CLF opposed plans to "bank" land for a second regional airport on the grounds that no such facility would be needed if Logan operated more efficiently and better use was made of existing regional airports and rail. CLF has also argued, in comments on Logan plans filed under the Massachusetts Environmental Policy Act (MEPA), that Massport should use "peak hour pricing" to help de-congest Logan's runways and reduce the disproportionate use of the airport by smaller planes.

Massport now comes forward, in the Draft Environmental Impact Statement/Report (DEIS/R) under consideration, with a highly controversial proposal to build an additional runway at Logan -- a proposal Massport unsuccessfully advanced thirty years ago -- and make certain other infrastructure and operational changes. The stated purpose of the runway and the other proposed infrastructure and operational changes is to address flight delays at Logan, not expand Logan's capacity. Given the magnitude of the proposal, the clear direction provided by the Secretary of Environmental Affairs' November 1995 Certificate on the Environmental Notification Form (ENF), and the over three years that Massport has had to prepare this DEIS/R, Massport should have returned with a document containing a first-rate alternatives analysis, both with respect to peak period pricing and other landing fee reforms, as well as the role of other airports and rail travel. Unfortunately, however, the DEIS/R alternatives analysis fails on both counts. First, Massport's submission fails to adequately assess the potential to reduce delays and make Logan more efficient through better administration of the existing airport -- like revamping landing fees and implementing "peak-hour pricing," a measure that would discourage small planes from clogging the airport during busy times. Second, it fails to adequately consider

98.1

the potential of other airports in the region and rail service to, in conjunction with runway pricing reform, handle enough of Logan's present and future business so as to largely alleviate the delay problem flagged by Massport. Most notably, Massport fails to consider the potential for T.F. Green Airport in Warwick, Rhode Island, and the Manchester Airport in Manchester, New Hampshire, to service more than merely their discrete geographic areas. These "regional reliever" airports already serve, and can provide far greater service in the future to, the Greater Boston metropolitan area. This is similar to the function that Newark Airport serves in the New York City area, and that Dulles and Baltimore-Washington Airports serve in metropolitan Washington, D.C. 98.2

Massport's failure to adequately consider administrative measures like peak-hour pricing and the potential of T.F. Green and Manchester airports is related to a larger and more serious problem: the absence of a regional strategy for dealing with Massport's ominous growth projections for Logan. Massport estimates that, whether or not the proposed runway is built, Logan's present level of 26.5 million passengers per year will grow to between 37.5 and 45 million passengers by 2010. A major regional planning initiative is needed right now -- before additional capacity is provided at Logan -- to address how to plan for this projected demand in the most efficient and environmentally sensitive way possible. 98.3

Essentially, Massport is proposing a short-term solution to a long-term problem. If the DEIS/R is accurate, then the "airside improvements" Massport proposes will simply reduce delay at Logan temporarily until the unrelenting surge in passengers using Logan and resulting airplane operations overwhelms even an expanded airport. Massport's failure to address the long term, however, does not mean that the DEIS/R adequately addresses the short-term question of delay and what alternatives exist to remedy that situation. The DEIS/R fails to address, in an effective, appropriate and sufficiently thorough manner, a number of important issues identified in the Secretary's Certificate on the ENF. Consequently, the EOEA Secretary pursuant to his authority under the Massachusetts Environmental Policy Act, as well as the Administrator of the Federal Aviation Administration (FAA) in her role as the federal official who will have to issue a record of decision for this process, should require that a *Supplemental* Draft Environmental Impact Statement/Report be prepared to deal with the issues which have not been adequately addressed in the DEIS/R. It would not be sufficient to address the deficiencies identified in the following comments, and the deficiencies identified by other commentors, in a Final EIS/R. The breadth and depth of the deficiencies are such that they require the preparation of a Supplemental DEIS/R which will *begin* to address the critical issues and concerns overlooked in the DEIS/R. 98.4

While the supplemental DEIS/R is being prepared, Massport can, in cooperation with the FAA, initiate a revised landing fee and peak period pricing pilot program. Working with the FAA to develop and implement such a pilot program would effectively insulate such a program from the legal challenges which undermined Massport's 1988 effort to reform Logan's landing fees to improve airport operations. The results of such a pilot program can be incorporated in the supplemental DEIS/R. Additionally, during this 98.5

same critical time period Massport will be able to better assess the emerging reality of high-speed rail in New England. The supplemental DEIS/R should reflect actual data, and enhanced projections based on such data, from the actual operation of Amtrak's Acela high speed rail service as well as revised data and projections concerning the use and role of the other regional airports. Finally, while the supplemental DEIS/R is being prepared, we urge Massport and other leading state officials to join with their counterparts in Rhode Island and New Hampshire, along with other interested parties throughout the region, to develop a workable, sustainable plan for inter-city travel in New England. The plan would address both the roles the different airports and rail services should be serving and how best to allow these airports to play those roles by, among other measures, fostering clean, non-automobile oriented ground transportation. 98.6

II. The alternatives analysis in Massport's DEIS/R is inadequate and requires that a Supplemental DEIS/R be prepared.

A. Massport fails to adequately assess the potential to address Logan's delay problems through better use of other airports and rail travel.

The Secretary of Environmental Affairs left no doubt in her Certificate that the "off-airport alternatives" to Logan expansion, namely better use of other airports in the region and rail travel, had to be thoroughly examined in the DEIR. Noting that this issue had "generated substantial and thoughtful commentary from many agencies, citizens, and organizations" and that she herself had "spoken at length" on the "need for an analysis of increased use both of other regional airports and intermodal transportation as viable alternatives to increased operations at Logan" in her Certificate on Massport's 1994 Generic EIR for Logan, the Secretary stated that "the Draft EIR should discuss these off-airport alternatives and analyze the potential each has to divert passengers and/or cargo from (and lower the operational impacts of) Logan Airport." (ENF Certificate, p. 3) Massport does discuss these issues, of course, but in an entirely inadequate manner.

Massport asserts that no matter what happens at other airports and on the rail system, the number of passengers demanding flights to or from Logan will rise to between 37.5 and 45 million by 2010. This is because Massport concludes that the best that can be hoped for from "regional alternatives" is a diversion of 7.5 million passengers, an amount about the size of the growth projection range. Massport essentially says that no matter what happens with other airports or rail, there still will be a delay problem. There are at least three problems with Massport's approach. First, it is entirely reactive rather than proactive; Massport does not concern itself with what significant steps it might take to boost this diversion number (although Massport's recent renewed interest in making better use of Worcester Airport is an encouraging development). A second closely related problem is Massport failure to assess, with or without such an enhanced Massport role, the potential of rail travel and other airports, most notably T.F. Green and Manchester airports, to handle more of the traffic currently being, or projected to be, handled by Logan. Third, Massport ignores the possibility that under different growth scenarios for other airports, Logan Airport's flight mix, so inefficiently burdened with small general aviation and

regional carriers, could be significantly altered so that Logan's flight operations per year could decrease enough to alleviate delays.

i. Massport's passive approach to regional alternatives.

Massport offers a disappointingly passive approach when it comes to the potential to serve travelers through facilities other than Logan. Massport suggests that the only role it can play regarding "alternative travel choices to provide relief to Logan" is to assist in their "promotion." (DEIS/R at 2-38.) As an independent quasi-public authority Massport has broad powers allowing it to engage in a wide range of activities. If, for example, Massport were to determine that entering into a Memorandum of Understanding with Amtrak under which Massport agreed to subsidize increased service to and from South Station to help reduce delay at Logan, there would be no legal impediment to the execution of such an agreement by Massport. Massport's varied aviation, maritime and development activities demonstrate the many roles that a public authority can play. Indeed, even if we were to accept the falsely limited notion of Massport's role as a "promoter" of regional alternatives, there is no analysis of the effect that different degrees and types of efforts in this area by Massport would have on use of such "alternative travel choices." What Massport should have done is present a wide range of alternatives in the DEIS/R in which enhancements, improvements and changes to a wide range of regional transportation facilities were proposed and analyzed and the role that Massport could play in facilitating these enhancements, improvements and changes was described. 98.7

ii. The emerging role of rail for travel within, as well as to and from, New England.

1. The coming of Acela: three hours door to door from Boston's Financial District to Midtown Manhattan.

Massport acknowledges that high speed rail in the Boston to New York corridor is imminent and will capture some of Logan's Boston to New York traffic. Massport relies on outdated 1994 Amtrak data for its projections, however. Since the preparation of the Final Environmental Impact Statement/Report and 4(f) Statement for Northeast Corridor Improvement Project Electrification in 1994 by the Federal Railroad Administration, more refined projections of ridership on the new high speed Acela service have been prepared and utilized by Amtrak. In the Supplemental DEIR, Massport should utilize Amtrak's most current ridership projections. Moreover, as noted above, requiring the preparation of a supplemental DEIS/R will give Massport the gift of time, time that will allow it to utilize an analysis of the *actual* operations of the new Acela High Speed Rail as well as updated projections of total ridership based on new data gleaned from actual operations in the supplemental EIS/R. 98.8

2. The T.F. Green connection: the DEIS/R ignores the critical rail developments in the Boston/Rte. 128 Station/Providence/T.F. Green segment of the Northeast Corridor.

The DEIS/R fails to mention the proposed construction of a major new intermodal transportation facility which will reshape even further our regional transportation system: the train station at T.F. Green Airport in Warwick, Rhode Island. A NEPA Environmental Assessment is being prepared for the station, and construction should be completed and the station operational by the end of 2001. The State of Rhode Island and the Commonwealth of Massachusetts have entered into an agreement regarding the extension of MBTA commuter rail to T.F. Green. CLF has learned from Amtrak's Vice President for Policy and Planning that Amtrak will stop Acela Express (high speed) trains at T.F. Green station if there is sufficient passenger demand and that all Acela Regional (conventional Amtrak service) trains are expected to stop there. He suggested that it is possible that Amtrak operations at T.F. Green may follow a pattern similar to its past operations at the Baltimore-Washington International Airport (BWI) station. When BWI Airport Rail Station opened for operations Amtrak scheduled stops at that station for approximately one-third of the trains on the corridor passing the airport. Today, only one Amtrak train traversing that corridor fails to stop at BWI Airport Rail Station, all other Amtrak trains (roughly 90% of Amtrak trips in that corridor) stop at BWI to pick up and discharge passengers.

The DEIS/R simply ignores these facts, which, in the very near future, will make it much easier for people in Boston and the southern suburbs of Boston in or near the Route 128 corridor to gain access to T.F. Green Airport in Rhode Island. As discussed above, the massive Northeast Corridor rail improvement and electrification project will speed rail travel on the existing Northeast Corridor, the passenger rail route connecting Massachusetts and Rhode Island. The agreement between the Commonwealth of Massachusetts and the State of Rhode Island to extend commuter rail service to the T.F. Green train station, coupled with Amtrak service, will provide frequent service between the T.F. Green Station and Massachusetts stations such as South Station and Back Bay Station in Boston and Route 128 Station, which sits at the intersection of the towns of Dedham, Westwood and Canton and where the MBTA is presently building a 2,670 space parking garage. This direct service might be augmented by proposed Rhode Island Department of Transportation rail shuttle service which would provide rapid and continual service between the Providence train station and T.F. Green. No attempt is made in the DEIS/R to discuss these rapidly approaching changes in the rail corridor between Boston and Rhode Island and to assess the impact that these changes will have on passenger behavior and choice and resulting demand, congestion, delay (or reductions in such factors) at T.F. Green and Logan. 98.9

3. Amtrak service to Portland: an impending reality and a service with great potential, especially when high speed rail service and possible air passenger service at Pease are considered.

Amtrak service on the Portland-Boston corridor is scheduled to commence in 1999. The Transportation Secretaries of Massachusetts, New Hampshire and Maine have jointly requested that Amtrak convert this line to high-speed service. This line passes very close

to Pease International Tradeport. an airport with tremendous unused runway capacity, and, evidently, there is a rail right of way from this corridor to Pease which could be used to easily ferry passengers from Amtrak trains to Pease.

While the DEIS/R does discuss the upcoming restoration of passenger rail service on the Portland-Boston corridor. there is no sophisticated quantitative analysis of the impact that such service would have on the regional transportation system and no mention of Pease in this context. The DEIS/R fails to present alternatives which would increase the use of this rail service so there is no study of whether such alternatives would reduce delay induced by small plane traffic between Maine communities and Logan. Additionally, the DEIS/R should have acknowledged the possible introduction of high-speed rail to this corridor and analyzed the impact that such a change would have on demand for service at Logan. 98.10

iii. The role of other airports in the regional transportation system.

The DEIS/R's analysis of the role that other airports in the region can play fails to address the possibility that travelers from within Route 495, and even in some cases within Route 128, will choose to use other airports besides Logan. The DEIS/R only examines the ability of airports like Manchester, T.F. Green and Worcester to "recapture" their local markets from Logan, overlooking the ability of these airports to attract passengers from metropolitan Boston and from the rest of the region. This deficiency ignores a phenomenon occurring at this very moment, as Southwest Airlines aggressively and successfully markets its Manchester and T.F. Green service to residents of metropolitan Boston. All the airports of New England. from Bradley which could serve as an alternative hub for major carriers to the smallest municipal airport which can provide a home for a two-seater General Aviation craft. should be integrated into such an analysis. Of course, growth at other airports would have to be carefully managed and should be integrated into the regional ground transportation network so travelers are using environmentally responsible modes for travel to and from these airports. A well managed regional transportation system may, for example. mean that a resident of Auburn would drive or take a bus to Worcester Airport (instead of the longer and more environmentally harmful drive to Logan) while a resident of Norwood might take a train to T.F. Green Airport in Rhode Island. Specific concerns. not addressed in the DEIS/R, about some of the key regional airports appear below.

1. Manchester Airport

As noted above, the ENF Certificate required that Massport look beyond its current role and examine "off-airport" measures that could be taken to address the delay problems that Massport cites in the DEIS/R. The failure of the DEIS/R to present alternatives which would encourage greater use of Manchester Airport as an alternative to Logan is a clear example of the failure of the DEIS/R to comply with these directives.

The DEIS/R does take note of the increased passenger load passing through

Manchester Airport, one of the fastest growing airports (in terms of passengers) in the nation. Inexplicably, however, the DEIS/R fails to consider that Manchester Airport may be drawing passengers from the Boston metropolitan area now and fails to project any measurable use of Manchester by travelers with trips originating within the Route 495 corridor. The supplemental DEIS/R needs to take a more sophisticated approach to its analysis of the role of Manchester- e.g., looking at current and future use of Manchester by business travelers going to and from hotels and businesses on and within Route 495 for example. 98.11

Beginning more than 10 years ago some of the more progressive regional and municipal governments in southern New Hampshire began to push for a re-introduction of passenger rail service into that area. Recently, the New Hampshire Department of Transportation requested that the MBTA extend its commuter rail service into New Hampshire to effect such a restoration, opening a dialogue between those agencies that is still in progress. At least one possible route for rail service into New Hampshire would allow for direct service to Manchester Airport. The supplemental EIS/R should include an analysis of the opportunity for rail service to Manchester Airport, including what Massport and its sister agencies can do to bring this about, and an analysis of the likely impact of this service on airport passenger demand. 98.12

2. T.F. Green Airport

T.F. Green Airport in Warwick, Rhode Island presents an only partly realized opportunity for our regional transportation system. It can do far more than "recapture" its local market from Logan- the role assigned it by the DEIS/R, and with proper non-automotive ground transportation links it can do so in a very environmentally responsible fashion. The failure of the DEIS/R to adequate account for the current trips by Boston area travelers who travel by air from T.F. Green in order to make use of Southwest Airlines' discounted service is a significant deficiency. The failure of the DEIS/R to factor in future use of T.F. Green by the residents of Greater Boston is an unfortunate logical extension of that first failure. Compounding these mistakes is the total failure of the DEIS/R to consider the changes in the regional rail system which will make travel to T.F. Green from Boston and along the rail corridor between Boston and Providence much easier. These changes are discussed at length above and must be factored into any analysis of the role that T.F. Green can play in the regional transportation system in general and in relief of Logan in particular. 98.13

3. Worcester Airport

The supplemental DEIS/R must contain a thorough examination of the facilities and potential of Worcester Municipal Airport. The new arrangement under which Massport will operate that airport will facilitate an active Massport role in fostering and building that airport. Alternatives for enhanced ground transportation facilities to and from Worcester Airport, including rail and shuttle bus should be developed, analyzed and presented in the supplemental DEIS/R, along with possible future passenger and operations 98.14

projections for the Worcester Airport, so the impact they will have on operations at Logan, as well as the environmental impacts of such changes, can be fully understood and considered.

4. Hanscom Field

The DEIS/R fails to fully propose, develop and analyze potential roles that the Massport operated civilian facility at Hanscom Field could play in the regional transportation system. At the very least, alternatives that provide for increased use of Hanscom for General Aviation (GA) use should be developed and analyzed. One possible model for use of Hanscom could be the role that Teterboro Airport in New Jersey plays in the New York metropolitan area. That airport does not have any significant passenger terminal facilities but has successfully shouldered the GA and helicopter load for New York City, moving this smaller air traffic out of the "stream" competing for landing and takeoff space at the three major airports operated by the Port Authority of New York and New Jersey. Measures that would discourage the airplanes responsible for the 25,000 annual GA operations that the DEIS/R forecasts for the foreseeable future from using Logan should be studied in tandem with measures that would encourage such planes to land at Hanscom or other "reliever" airports outside of Boston, ranging from the regional airports discussed above to the small GA only airports throughout the region. 98.15

iv. Massport fails to adequately assess the potential for other airports in the region and rail to receive a significant enough portion of Logan's air traffic – particularly small carriers – to improve Logan's delay problem and dispense with the new runway proposal.

Massport claims that proposed Runway 14/32 is needed to deal with the problem of northwest or southeast winds currently hampering operations by forcing Logan to use two rather than three runways, thereby reducing the operations per hour rate by 25%, from 120 to 90.[1] Massport's view is that the new runway will permit Logan to function more often at its maximum capacity of 120 operations per hour, thereby reducing delay. Massport does not even pay lip service to the important possibility of solving this same delay problem by another means: diverting a sufficient percentage of Logan's flight operations to other airports and rail so as to reduce Logan's operations per hour to 90. Under this scenario, with the exception of about 10 days a year, the northwest/southeast wind problem disappears -- *without having to build a new runway* -- because with these wind conditions Logan can handle up to 90 operations per hour. Particularly if the bulk of the diverted flights were small planes – see discussion below on peak period pricing and other runway pricing reforms – Logan's efficiency would improve, as operating small planes on the same runways/flight paths as large planes causes additional delays (small planes need to be spaced further from large planes because they can have difficulty flying in the "wake" of large planes). 98.16

[1] Massport asserts that approximately 10 days a year Logan experiences severe northwest winds that forces it to operate just one runway, which limits it to 60 flight operations per hour.

B. Massport fails to adequately assess the potential to address Logan's delay problems through peak period pricing or other runway fee reforms.

A central mandate of the ENF Certificate, which Massport voluntary agreed to undertake, was an analysis of peak period pricing and other administrative measures designed to alter the mix and timing of airplane operations in and out of Logan in order to better manage the Airport and reduce delay. That this would be a critical element of the DEIS/R inquiry makes considerable sense when Logan's flight mix is considered. Approximately 90% of Logan's passengers are accommodated on about half of the flights in and out of the airport. The other half of the flights carry the remaining 10% of the passengers. This is a highly inefficient use of limited runway space, and, it is our understanding, is atypical for major American airports. The notion of imposing a pricing mechanism that would discourage small planes in the peak hours, and/or that would lead to some trip consolidation so that the total number of small plane operations decreased, while still insuring that essential service to other cities in the region continued, has significant appeal.

Massport, unfortunately, has not presented a credible analysis of peak period pricing (and does not address any other possible runway pricing reforms). Rather than setting out to figure out what it would take in the way of peak hour pricing or other runway pricing reforms to achieve significant delay reduction benefits at Logan, Massport instead sets out to answer the question: "What effect would a very low peak hour fee ($150 per flight) have on operations and delay at Logan?" Just as discouraging is the limited analysis given this watered down version of peak period pricing. 98.17

There are only a few select sources of data on the effect that administrative delay reduction/capacity management programs like non-weight based landing fees peak period pricing will have on actual operations at an airport. Limited efforts in the New York metropolitan area can be analyzed. Previous experiments overseas, like the Sydney (Australia) effort referenced by the U.S. Environmental Protection Agency (EPA) in its comments on the NEPA scope, can be considered. The actual operation of the withdrawn Program for Airport Capacity Efficiency program (PACE) at Logan, discussed below, can be considered and re-evaluated in light of applicable federal law and regulations. None of these data are considered in the DEIS/R.

Massport's analysis applies a blunt single price formula to current operations and assumes that air carriers will react in simplistic ways- either by canceling flights or moving a few "shoulder" flights out of the peak period window. Other potential responses of carriers to such a scheme, including using larger aircraft for fewer flights, are ignored. As a result, Massport never even considers the possibility that a runway pricing system could be imposed that materially alters the flight mix at Logan so that a significant number of small flights are diverted elsewhere, canceled, or consolidated into fewer larger plane flights. Were this to happen such that total operations per hour were markedly reduced, runway pricing reform could meaningfully aid with the northwest/southeast wind delay

problem Massport describes.

i. Massport should look to its own experience for evidence of the salutary effects that revised landing fees and peak period pricing can have on airport operations.

In December 1987, Massport introduced its Program for Airport Capacity Efficiency (PACE). The purpose of PACE was to eliminate a *de facto* subsidy for small aircraft operations and reduce airport congestion. To achieve these ends, PACE included both a restructured landing fee and "peak-hour pricing", an additional fee for landing during congested rush hour periods. The new landing fee went into effect on July 1, 1988 and was used until December 22, 1988 when the U.S. Secretary of Transportation ruled that the restructured landing fee had not been calculated properly and that the exception in the program designed to protect smaller regional airports did not apply to enough such airports. This ruling was upheld (and a court decision in favor of the restructured landing fee was reversed) in New England Legal Foundation. v. Massachusetts Port Authority, 883 F.2d 157 (1st Cir. 1989). The peak-hour pricing portion of PACE was never instituted.

In February 1989 -- two months after the PACE landing fee was discontinued -- Massport issued a summary[2] of the PACE fee's remarkably favorable impact on Logan's operations:

1. On-time performance at Logan was significantly improved. Not only did the percentage of on-time departures increase markedly, but Logan's relative on-time performance rose steadily in comparison to the performance of other busy airports around the country. In September of 1987, when DOT started issuing "report cards" grading on-time performance at the nation's 27 busiest airports, Logan ranked 21st. In September of 1988, [Logan] had moved up to 12th; in October, [Logan was] 11th; in November [Logan] ranked 10th; and, by the end of December, when DOT ruled against PACE, [Logan] had achieved the astonishing rank of 2nd-best in the nation for on-time performance.

2. Commuter carriers carried slightly more passengers in slightly fewer flights on significantly larger airplanes. This action spread the cost of landing fees over more seats per trip, and reduced the number of flights on heavily traveled routes, thus improving the efficiency with which the commuter carriers used Logan's finite and valuable airfield capacity. Some carriers increased their fares in response to the new fees, but the fare increases did not slow the growth of ridership.

3. Thanks in part to Massport's "Essential Air Service" Exemption Program, smaller commuter markets suffered no adverse consequences from the higher landing fees

[2] PACE Update, February, 1989 by Thomas P. Champion, Assistant to the Executive Director, Massport (*hereinafter* "PACE Update").

4. General aviation (GA) traffic at Logan declined by about one-third, but did not disappear. Since the per-hour cost of operating business jets and turbo-props has always been high, the PACE landing fee had no effect on this segment of the GA population at Logan, which continued to use the airfield with its accustomed frequency. Smaller, single engine aircraft did make less frequent use of Logan, although this change did not result in the "diversion" of traffic to Hanscom Field. Since travelers who used these small aircraft tended to be traveling within a 150-mile radius of Logan, and since most of them were using private planes to move to and from markets which were also served by served by scheduled commercial service, Massport staff correctly predicted that the users of these smaller planes simply switched over to scheduled air service or to some other mode of transportation. Perhaps the most interesting GA statistic is that *more than half of the private aircraft using Logan during the PACE fee period were traveling to or from points which offered scheduled air service.* In other words, general aviation is demonstrably more a tool of convenience and luxury than of necessity.

(PACE Update; p. 3.) Both the Secretary of Transportation and the First Circuit stated in their decisions concerning PACE that a program with the substantive effects of the PACE program could be successfully implemented by Massport, if it was developed and implemented correctly.

In 1993, Massport made a well-reasoned presentation of a revised program that was designed to conform with federal law as articulated by the Secretary of Transportation and the First Circuit. This presentation described a specific peak-hour pricing proposal and showed that, if this proposal was implemented, it would reduce peak-hour flights by 10-17.5 percent. (Massachusetts Port Authority, "Logan Airport Peak Hour Pricing" (Apr. 1993) (Attachment 1); Arthur D. Little, Inc., for the Massachusetts Aeronautics Commission. "Strategic Assessment Report -- Final Report," p. 4-42 (July 1993).)

Like PACE this program moved Logan away from a traditional landing fee based solely on the weight of a plane and levied landing fees based partly on the weight of the plane and partly on an operations charge based on the type of plane with an additional peak period fee for peak period landings and take-offs. Massport withdrew this proposal prior to implementation.

It is important to recognize that peak-hour pricing affects congestion levels primarily by causing modest shifts in departure times and types of aircraft used, not by dampening passenger activity. According to Massport, a reduction in peak-hour congestion would "come mainly from a reduction in commuter [flight] activity during peak hours, especially in markets with ready commuting alternatives." (Massport, "Logan Airport Peak Hour Pricing.") Massport "does not expect that any of the commuting markets served by Logan Airport would suffer a significant reduction in access to the airport." (Id.) Roughly one-third of the reduction in peak-hour flight activity would result from a rescheduling to off-peak hours. (Id.) Peak-hour pricing is projected not only to

result in a substantial reduction in delays at Logan, but to reduce average costs per operation for flights with about 110 passengers or more. (Id.)

From passengers' point of view, the perceptible effect of peak-hour pricing would be a substantial reduction in delays. "During peak periods, Massport would expect a 5% reduction in the use of the airfield to cause at least a 20% drop in average expected flight delays." (Id.) Since Massport expected that peak-hour pricing would result in a 10-17.5 percent reduction in peak-hour flights, travelers would thus experience a 40 to 70 percent reduction in delays.

Passengers would not experience a noticeable reduction in service. Massport calculated the estimated impact on the number of peak-hour weekday seats available on flights between Logan and 49 airports in the eastern United States and Canada. Overall, only 3 percent of peak-hour seats (not all seats) in those markets would be canceled. (Massport, "Logan Airport Peak Hour Pricing Plan.")[3] Three-quarters of those markets would experience the cancellation of 3 percent or less of peak-hour seats, and 22 of them would experience the cancellation of no peak-hour seats at all. (Id.) Ticket prices for the 49 markets would increase a mere 1 percent (id.) -- a price well worth paying for the substantial reduction in delays, and the avoided taxpayer outlays and environmental impacts that building new runway capacity would entail.[4]

The benefits of peak-hour runway pricing would therefore be substantial and widely shared. Travelers would benefit from lower costs, reduced delays, and the use of larger, safer, more comfortable aircraft. Communities around Logan Airport, Hanscom Field and other existing or potential airports would avoid airport expansion undertaken to accommodate the inefficiencies of heavy reliance on small aircraft. Such communities all share a strong interest in the adoption of peak hour pricing at Logan Airport. The Commonwealth as a whole would benefit from avoiding the potentially huge capital and operating costs of accommodating a continuation or growth of existing inefficiencies. The

---

[3] The reduction in the number of peak-hour flights in the 49 regional markets was estimated to be 7 percent -- more than double the estimated reduction in the number of peak-hour seats, which is as it should be. It should be noted that two markets in which Massport predicted the most flights would be canceled -- Boston-Portland and Boston-Bangor, which would lose 21 percent and 15 percent of peak period weekday flights, respectively -- both experienced an explosion in the number of daily flights during the early 1990s recession: Boston-Portland daily departures grew by 121 percent in 1988-1993, and Boston-Bangor daily departures grew by 92 percent in that period. (Massport, "Logan Airport Peak Hour Pricing Plan.") With peak-hour pricing, Portland would still have twice as many flights as it did in 1988, and Bangor would have roughly one and three-quarters as many flights as it did then. (Id.) The two markets would have only 9 and 14 percent fewer peak-hour seats, respectively, than in 1993 (id.), and about the same number of daily seats.

[4] A few regional airports served by flights to and from Logan do not have runways that can accommodate jets. It is CLF's understanding, however, that all or virtually all the airports which Massport predicted would have fewer weekday peak-period flights to and from Logan can accommodate jets. One airport with a notable lack of jet capacity is the Provincetown Airport -- which Massport predicted would experience no decrease in weekday peak period flights or seats, and where the impact of peak hour pricing would be reflected solely in a fare increase of 12 percent. (Massport, "Logan Airport Peak Hour Pricing Plan.")

region and nation would benefit from more energy-efficient flight operations.

It is not surprising that the national jury of experts who heard testimony at "The Boston Conference" in 1994 included peak-hour runway pricing at Logan Airport in the recommendations it issued. The jury wrote:

> [T]he Commonwealth should adopt "congestion pricing" (charging landing fees that increase at peak travel times) to mitigate bottlenecks and delays at Logan that would impede the region's future economic growth. The Jury believes that this approach offers a relatively inexpensive and flexible demand management strategy, prolonging the use of Logan at its present location without requiring controversial runway expansion.

(Harvey M. Gantt, et al., "The Boston Conference Final Report: National Jury Recommendations," pp. 4-5 (Aug. 24, 1994).)

No justification is given in the DEIS/R for the failure to propose and study an alternative applying a more complex pricing mechanism, like that presented by Massport in 1993 or discussed by the Boston Conference, augmented by a range of peak hour fees (as contemplated by the 1993 proposal). Such an alternative should be a prominent feature of the supplemental DEIS/R. 98.18

Discussion and study of such an alternative must include an examination of varying levels of peak period fees. Additionally, such an analysis should not restrict itself to an assumption that significant delay reductions through runway pricing reform occur only when the airlines "overschedule" and attempt to have more than 120 operations per hour occur at Logan. As noted above, Massport should be directed in the supplemental DEIS/R to consider what it would take in the way of peak period pricing or other runway pricing reforms to bring Logan's operations per hour number closer to 90, thereby largely obviating the supposed need for an additional runway. A full range of possible carrier reactions should be considered, such as moving to larger planes or the consolidation of existing companies providing service to smaller airports.

ii. The Federal program to maintain air service to isolated smaller airports, a Massport version of such a program, or a joint Federal/Massport implementation of this program may reduce or eliminate Massport's "market access" concerns regarding smaller airports.

The federal Essential Air Service (EAS) program is intended to ensure that communities with relatively low commercial airplane traffic do not lose service entirely, it is deeply disturbing that the DEIS/R does not examine the mitigating effect that this program might have on Massport's concerns regarding reduction in service to certain outlying communities. The U.S. Department of Transportation ("DOT") administers the EAS program by determining the minimum level of service required at each eligible

community. DOT specifies a hub through which the community is linked to the national network, a minimum number of round trips and available seats that must be provided to that hub, certain characteristics of the aircraft to be used, and the maximum permissible number of intermediate stops to the hub. Where necessary, DOT subsidizes a carrier to ensure that the specified level of service is provided.

A review of the DOT website indicates that EAS is subsidizing air service from Logan to: Augusta/Waterville, ME; Bar Harbor, ME; Rockland, ME; Rutland, VT; and Keene, NH. Additionally, that website indicates that the following destinations from Logan have been deemed eligible for EAS subsidies: Bridgeport, CT; New Haven, CT; Bangor, ME; Portland, ME; Presque Isle/Houlton, ME; Hyannis, MA; Martha's Vineyard, MA; Nantucket, MA; Laconia, NH; Lebanon, NH/White River, VT; and Manchester/Concord, NH. More details about the federal EAS program may be found at on DOT's website at http://ostpxweb.dot.gov/aviation/rural/ruralair.htm.

There are three ways Massport can pursue an EAS subsidy for service to given community. First, it may try to initiate DOT review of a community which is not currently eligible for an EAS subsidized carrier (assuming that no carrier or only one carrier currently provides service to that community). (See 14 C.F.R. § 325.10.) Second, Massport may submit a proposal to DOT for "Enhanced Essential Air Service." Under an Enhanced "EAS" program, either a) Massport would provide 50% of the subsidy for the proposed service (and DOT would provide the other 50%) or b) DOT would pay 100% of the subsidy but review the proposal for success after 2 years. Finally, Massport could implement its own EAS program which mirrors (or closely follows - subject to DOT's approval) DOT's program. (*See* New England Legal Foundation v. Mass. Port Authority, 883 F.2d 157 (1st Cir. 1989)). If it chose to create its own EAS program without developing it jointly with FAA, Massport would have to pay the subsidy itself either by cash payment or by special adjustment to landing fees.[5]

The full analysis of revised landing fees and peak period pricing in the supplemental DEIS/R must include a thorough discussion and review of the Federal EAS program and how it would eliminate, reduce or mitigate the negative effects on air service to outlying communities. 98.19

iii. The "Case Studies" appended to the DEIS/R fail to prove that a sophisticated and properly developed and implemented reform of landing fees and/or peak period pricing scheme would harm the Cape and Islands.

The "Regional Carrier Case Study" and "Cape Cod [& Islands] Case Study" in Appendices F and G of the DEIS/R are a cursory review of the economic development strategy of that part of Massachusetts and the role that air travel plays in that strategy and a

[5] The Massport EAS program was struck down in part because it did not include as many communities as the federal version.

very simple analysis of the possible impact that the simplified peak period pricing scheme discussed in the DEIS/R might have on that service. No attempt is made in these appendices, or elsewhere in the DEIS/R, to consider other alternatives which might satisfy the transportation needs of these communities. We cannot know if high speed ferry service, enhanced bus service or rejuvenated rail service (or some combination of these or other options) could compensate for any adverse effect on air service brought about by runway pricing reforms - this analysis is simply not present in the DEIS/R. 98.20

Additionally, the analysis in these appendices fails to take into account the possibility that any landing fee reform program and/or peak period pricing scheme would include an essential air service exception to ensure there would be adequate basic service to regional airports. It also fails to consider the potential palliative effect of the federal Essential Air Service (EAS) program discussed above.

III. The capacity increasing potential of proposed Runway 14/32 should be studied and the environmental impacts of the capacity increase assessed.

Massport states that proposed Runway 14/32 would not result in any additional capacity at Logan since it would not allow Logan to exceed its current ceiling of 120 flight operations per hour in any given hour. But the new runway would allow Logan to handle 120 flights per hour *more of the time*, which, when Massport's ominous growth projections for Logan are considered, surely would result in more passengers and flights at Logan with the runway than without. According to Massport's projections, the delay hours are to mount at Logan with or without the new runway, but Massport contends that the delays will be considerably worse without the new runway. Really dreadful delays would presumably influence air carrier business decisions and passenger travel decisions such that Logan without the new runway would handle fewer flights and passengers than Logan with the new runway. The extent of this proposed increase in capacity must be studied and its environmental impacts, both airside and groundside, analyzed. 98.21

IV. Technological advances and changes which could change airport operations should be studied in the supplemental DEIS/R.

A conversation with a former Chairman of the Massport Board of Directors with over 30 years of experience in the operations and planning of airports yielded the observation that in the late 1960's and early 1970's (when Runway 14/32 was first proposed) there was a general belief that there would be a surge in the number of travelers traveling by air during the next 30 years and that this required a large scale program of building runways at existing airports to handle this increase. Of course, half of this prediction was completely accurate. Far more people travel far more miles by air today than in 1969. However, advances in technology- notably the proliferation of larger aircraft and advances in electronics (and in particular avionics) have enabled many of the airports that were in use at that time to handle the increased traffic without significant additional runway space.

It is reasonable to ask if history might repeat itself? Could advances in technology significantly reduce delay at Logan and other airports- not just in good weather but in bad as well? Is there current or anticipated technology that should be studied as an alternative to some or all of the airside improvements proposed by Massport? Massport summarily states that delays "caused by most weather conditions cannot be eliminated." (DEIS/R p. 1-3.) Are the prospects for technological advances to facilitate airport operations in adverse weather conditions really this bleak? Perhaps so, but we simply do not know based on the DEIS/R. Doing this analysis may require a more sophisticated presentation of the causes of delay at Logan. For example, how much delay is due to fog reducing visibility, how much is due to snow buildup on runways? This is precisely the type of alternative which should have been the subject of analysis in the DEIS/R and its absence is yet another reason why a supplemental DEIS/R is required. 98.22

V. The DEIS/R does not adequately address the Environmental Justice questions critical to both federal and Massachusetts environmental review

Executive Order 12,898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires each federal agency to identify and address environmental and health effects of its activities that particularly burden minority and low income communities. (Exec. Order No. 12,898, § 1-101, 59 Fed. Reg. 7,629 (1994).) A purpose of the executive order is to "reinforce" agencies' obligations under NEPA and Title VI of the Civil Rights Act of 1964. (See 62 Fed. Reg. 18,378 (1997).) The executive order, like NEPA and MEPA, is intended to force agencies to improve their decisionmaking processes. It focuses on both minority and low-income communities, whereas Title VI applies only to discrimination based on race, color, or national origin and does not directly address poverty issues. (See President Clinton, Memorandum for the Heads of all Departments and Agencies (Feb. 11, 1994).) To achieve its goals, the executive order relies on existing environmental and civil rights laws, particularly NEPA and Title VI.

In response to the executive order, the U.S. Department of Transportation has prepared an environmental justice strategy (60 Fed. Reg. 33,896 (1995)) and issued an Order on Environmental Justice. (62 Fed. Reg. 18,377 (1997).) Like the executive order, the DOT Order draws on existing laws, "primarily NEPA [and] Title VI of the Civil Rights Act of 1964." (62 Fed. Reg. 18,378 (1997).) The DOT Order "is intended to insure that a process for the assessment of environmental justice factors becomes common practice in the application of [NEPA, Title VI] and related[] statutes." (Id.) Incorporation of environmental justice principles in all DOT activities is to be accomplished, by "fully considering [those] principles throughout planning and decision-making processes in the development of programs, policies, and activities, using the principles of the National Environmental Policy Act." (Id. at 18,379.)

The DOT Order provides that NEPA and other statutes will be administered so as to identify, early in the development of an activity, the risk of discriminatory impacts so that appropriate action can be taken. (Id. at 18,380.) In implementing NEPA, "where

relevant, appropriate and practical." DOT agencies are to obtain information about the population served and/or affected by race, color, national origin, and income, along with information about steps to guard against disproportionately high adverse impacts. Id. "[D]isproportionately high and adverse impacts on minority populations and low-income populations" are to be avoided by, inter alia, proposing measures to avoid, minimize, and/or mitigate such impacts; providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by the activities involved; considering alternatives that would avoid or minimize such impacts; and eliciting public involvement and "soliciting input from affected minority and low-income populations in considering alternatives." (Id.) An activity that will have a disproportionately adverse effect on minority or low-income populations is to be carried out "only if further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effect are not practicable." (62 Fed. Reg. 18,380.) DOT's findings and analysis made in fulfillment of these requirements "must be appropriately documented, normally in the environmental impact statement or other NEPA document." (Id.)

Federal agencies are required to comply with executive orders and with their own regulations and guidelines and DOT states in its order that "[c]ompliance with Executive Order 12,898 is an ongoing responsibility." (62 Fed. Reg. 18,379 (1997); see also Delaney v. EPA, 898 F.2d 687, 693 (9th Cir. 1990) (agency must adhere to own guidelines); Steven Ostrow, Note, Enforcing Executive Orders: Judicial Review of Agency Action Under the Administrative Procedure Act, 55 Geo. Wash. L. Rev. 659 (1987).)

98.23

The absence of any substantive environmental justice analysis in the DEIS/R even remotely meeting the requirements of the executive order and the DOT Order is especially shocking considering the location of the project: in East Boston, a community where, as of 1990, 18 percent of the residents were of Hispanic origin, 13 percent were members of non-white minorities, and 18 percent were white people with incomes below the poverty level. (See U.S. Department of Commerce, Bureau of the Census, "1990 Census of Population and Housing," Summary Tape Files 1, 3.) The Asian-American and Hispanic groups in the East Boston community is believed to have grown since 1990 and the impacts of this project on those communities, as well as the minority and low-income communities in Logan's flight path, should have been considered for the purposes of both NEPA and MEPA review.

While the environmental justice issues and analysis raised by the executive order and DOT Order, and which underpin EPA's extensive comments on this subject, are derived from Federal law, policy and orders the principles, information and analysis on which EPA relies on fully applicable to the MEPA process and provide further reason to conclude that the DEIS/R is inadequate. The Secretary of Environmental Affairs has the statutory and regulatory tools and the ability to address the critical environmental justice raised by EPA and ignored by Massport. The MEPA process can play a pivotal role by ensuring that minority and low income communities do not shoulder a disproportionate share of the environmental effects of projects such as the one under consideration here.

VI. Additional environmental concerns not adequately addressed in the DEIS/R

98.24 The discussion of impacts of the proposed airside improvements on the Boston Harbor Islands is facially inadequate. The effort to use the provision in the Boston Harbor Islands National Recreational Area statute (16 U.S.C. § 460kkk) which states that Logan air traffic passing overhead is not "constructive use" of the park National Recreational Area as a general NEPA and MEPA waiver is plainly improper. These provision simply means that overflights of the Islands cannot be deemed "use" of the Islands for purposes of Section 4(f). It has no effect on the requirement of NEPA and MEPA that all alternatives be analyzed to determine their full noise and visual effects on humans camping on the Harbor Islands and in boats in the vicinity of the Islands, as well as on all animals in and around the Islands.

98.25 The discussion of the Upland Sandpipers who currently nest in the path of the proposed Centerfield Taxiway references the mitigation plan which has been developed by Massport, in consultation with the Massachusetts Heritage & Endangered Species Program. This plan may be adequate but it should be fully aired prior to its inclusion in a Final EIR/S. Moreover, no case has been made yet in any environmental review document that all efforts have been made and exhausted to avoid or reduce impact on this State listed species and that mitigation by creating new habitat far from this site which will benefit other members of this species is the appropriate course.

98.26 The air quality analysis in the DEIS/R has serious deficiencies, as demonstrated by the comments of Dr. Henry S. Cole. As Dr. Cole observes, the total absence of an analysis of the air quality effects of particulate matter with a diameter of less than 2.5 microns (PM 2.5) from aircraft, increased motor vehicle emissions and emissions outside of Route 128 or with an altitude greater than 3,000 feet are all glaring omissions. Moreover, Dr. Cole makes important observations about the potential air quality effects of the unchecked growth with is assumed in the EIS/R as well as the potential unstudied health hazards which may be present in the vicinity of Logan at this moment. A supplemental EIS/R is needed to lay out alternatives which are intended to address these concerns and to analyze the effects that all alternatives may have on air quality, both in the immediate vicinity of Logan and throughout the region. Such studies should also look at the cumulative effect of large amount of emissions occurring at peak air travel hours and determine if a peak period pricing scheme could have a positive impact on air quality by dispersing NO_x and other emissions more evenly of the course of the day.

VI. Conclusion

98.27 For the foregoing reasons, Massport has failed to make its case that it needs Runway 14/32. The alternatives analyses, both with regard to peak hour pricing/runway pricing reform and the role of other regional airports and rail, as discussed at length above, need serious additional work. Accordingly, a Supplemental Draft Environmental Impact Statement/Report is warranted. The time necessary to do a credible job on the SDEIS/R may permit Massport to analyze actual data from the forthcoming Acela high-speed rail

service and collaborate with the FAA on a peak period pricing/runway pricing reform experiment. Finally, we strongly urge that, in conjunction with the thorough alternatives analyses necessary for the runway proposal, Massport leadership and other appropriate Massachusetts state officials join with their counterparts in Rhode Island and New Hampshire, along with other interested parties throughout the region, to develop a workable, sustainable plan for inter-city travel in New England. The plan would address both what roles the different airports and rail services should be serving as well as how to achieve these results.

Letter 98
Conservation Law Foundation
Stephen H. Burrington, General Counsel

Code	Topic 1	Topic 2	Comment	Response
98.1	Alternatives	Peak Hour Pricing	... fails to adequately assess the potential to reduce delays ... by implementing "peak-hour pricing,"...	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. See Section 4.5.4 of the Supplemental DEIS/FEIR.
98.2	Regional Transportation	Regional Airports	Massport fails to consider the potential for T.F. Green Airport ...and the Manchester Airport ...to service more than merely their discrete geographic areas.	The regional airport diversion analysis presented in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR was based on objective service area assumptions. Each service area was defined solely by driving time criteria. In other words, each regional airport's service area consists of cities and towns for which it is the closest airport, regardless of the availability of more extensive services and/or lower airfares at more distant, but larger airports such as Logan Airport. Thus, the service areas for T.F. Green/Providence and Manchester airports extended into portions of northern and southeastern Massachusetts; areas normally considered part of Logan Airport's primary market area.

Code	Topic 1	Topic 2	Comment	Response
98.3	Regional Transportation	Regional Airports	A major regional planning initiative is needed right now ...	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts. One of the issues that the FAA directed the group to discuss is the inclusion of additional data related to regional transportation alternatives in the Supplemental DEIS/FEIR. Over the last ten years, various agencies and transportation planning organizations have conducted a number of studies that address regional transportation issues. These studies form the basis of a comprehensive regional transportation strategy that includes the Airside Project at Logan Airport, expansion and growth of the regional airports, and the implementation of high-speed rail and other regional rail projects. All these measures are necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation. By the end of 2000, Boston residents had several alternatives to Logan Airport including Worcester Regional Airport, Manchester Airport, T.F. Green/Providence Airport, Pease International Tradeport, and Amtrak's high-speed Acela train service. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a complete discussion of options to Logan Airport. Massport has a history of engaging in cooperative regional transportation planning and continues its efforts to promote an efficient and balanced regional transportation system. Massport's most recent endeavors include its assumption of operating responsibility for the Worcester Regional Airport in January 2000 and its co-sponsorship of the Regional Transportation Summit of New England Governors in November 1999. Refer to Section 2.9 of the Supplemental DEIS/FEIR for a discussion of Massport's initiatives in support of regional transportation alternatives.

Code	Topic 1	Topic 2	Comment	Response
98.4	Environmental Review Process	MEPA	The breadth and depth of the deficiencies are such that they require the preparation of a Supplemental DEIS/R ...	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts. The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
98.5	Alternatives	Peak Pricing Program	Suggest immediate implementation of a pilot peak period pricing program.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. See Section 4.5.4 of the Supplemental DEIS/FEIR.
98.6	Regional Transportation	Passenger Rail	Request emerging reality of high-speed rail be assessed.	The analysis of regional alternatives presented in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR relies on air to high-speed rail diversion estimates published in the Supplemental DEIS/FEIR and Section 4(f) Statement, Northeast Corridor Improvement Project, prepared by the Federal Rail Administration in October 1994. In preparing the Supplemental DEIS/FEIR, Massport contacted Amtrak for more recent estimates, but Amtrak did not have any updated ridership estimates that could be released to Massport. Amtrak's written response to Massport's request for updated ridership numbers is contained in Appendix B of the Supplemental DEIS/FEIR.
98.7	Regional Transportation	Passenger Rail	[Request that Massport] present a wide range of alternatives...in which enhancements, improvements and changes to a wide range of regional transportation facilities were proposed and analyzed and the role that Massport could play in facilitating these enhancements...	Massport's analysis of regional alternatives is comprehensive and reflects all the major recommendations of various regional planning studies that have been conducted over the last decade. These include expansion of the regional airports and development of high-speed rail in the Boston-New York market.
98.8	Regional Transportation	Passenger Rail	Incorporate more current Amtrak projections in analysis.	Refer to response to Comment 98.6.
98.9	Regional Transportation	Passenger Rail	Provide rail discussion/analysis that includes new T.F. Green Airport and Route 128 Stations.	Refer to Section 2.9 of the Supplemental DEIS/FEIR for a discussion of the Warwick train station and people mover connection to T.F. Green/Providence Airport.

Code	Topic 1	Topic 2	Comment	Response
98.10	Regional Transportation	Passenger Rail	Provide detailed quantitative analysis that the restoration of passenger rail service would have on Portland-Boston corridor including potential connection to Pease.	The restoration of Portland-Boston rail service was analyzed in the Draft EIS/EIR. According to the Portland Rail study, more than 99 percent of travel in the Portland-Boston corridor is by automobile. The same study estimated that restoration of the rail service would have no impact on the amount of travelers using air because the rail travel time is not competitive with the air mode. Additionally, the air market is estimated at only 100,000 annual passengers. This is less than one-half of a percent of Logan Airport's total passenger traffic in 1999. Refer to Section 2.4 of the Draft EIS/EIR.
98.11	Regional Transportation	Regional Airports	...needs to take a more sophisticated approach to...looking at current and future use of Manchester by business travelers going to and from hotels and businesses on and within Route 495 ...	Refer to Chapter 2 of the Supplemental DEIS/FEIR for a discussion of air service development at the Manchester Airport and Logan Airport passenger diversion to the Manchester Airport.
98.12	Regional Transportation	Passenger Rail	... should include an analysis of the opportunity for rail service to Manchester Airport, ...	Refer to Section 2.9 of the Supplemental DEIS/FEIR for a description of all ground access improvement projects at the regional airports that are currently in the environmental planning or construction phases.
98.13	Regional Transportation	Regional Airports	[Does not adequately] account for the current trips by Boston area travelers who travel by air from T.F. Green ... [or] ... to factor in future use of T.F. Green by the residents of Greater Boston ...	The T.F. Green/Providence and Manchester airports have experienced significant traffic growth over the last several years as a result of new low-fare, jet airline services to short-and medium-haul destinations. The emerging role of these airports in serving the region's demand is documented in Sections 2.3 and 2.4 of the Supplemental DEIS/FEIR.
98.14	Regional Transportation	Regional Airports	... must contain a thorough examination of the facilities and potential of Worcester Municipal Airport.	Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with the Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. By its agreement with the City of Worcester, Massport could assume ownership of the Worcester Regional Airport by 2005. On February 1, 2000, Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition, MassHighway is analyzing alternative highway routes that would improve surface access from I-90 and I-290 to the Worcester Regional Airport and filed an ENF in December 1999. They have begun the preparation of a Airside Project Draft EIS/EIR for these improvements. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other alternative regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. Refer to Section 2.2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives.

Code	Topic 1	Topic 2	Comment	Response
98.15	Regional Transportation	Regional Airports	... alternatives that provide for increased use of Hanscom for General Aviation (GA) use should be developed and analyzed.	Refer to Section 2.6 of the Supplemental DEIS/FEIR for a description of Hanscom Airfield's role as a general aviation reliever airport for Logan Airport. Hanscom Airfield currently has six times the general aviation activity of Logan Airport. General aviation users of Logan Airport must pay a landing fee, while there is no landing fee charge at Hanscom Airfield for general aviation users.
98.16	Regional Transportation	Regional Airports	Massport does not even pay lip service to the important possibility of solving this same delay problem by another means: diverting a sufficient percentage of Logan's flight operations to other airports and rail so as to reduce Logan's operations per hour to 90.	Refer to response to Comment 98.2, the regional diversion analysis presented in Chapter 2 of the Draft EIS/EIR, and the PPP case studies in Appendices F and G of the Draft EIS/EIR.
98.17	Alternatives	Peak Period Pricing	... has not presented a credible analysis of peak period pricing ...	Refer to response to Comment 98.1.
98.18	Alternatives	Peak Period Pricing	No justification is given ... for the failure to propose and study an alternative applying a more complex pricing mechanism, ...	Refer to response to Comment 98.1.
98.19	Alternatives	Peak Period Pricing	The full analysis of revised landing fees and peak period pricing ... must include a thorough discussion and review of the Federal EAS [Essential Air Service] program ...	The PPP exemption analysis in the Supplemental DEIS/FEIR responds to the directives of the EOEA Secretary in his certificate on the Draft EIR. A discussion of Massport's proposed PPP Exemption Program, which covers all EAS eligible communities in New England with a Boston service designation, is discussed in Section 4.5.3 of the Supplemental DEIS/FEIR.
98.20	Alternatives	Peak Period Pricing	No attempt is made ... to consider other alternatives which might satisfy the transportation needs of these [Cape Cod] communities [if peak period pricing were implemented].	Refer to Section 4.5.3 of the Supplemental DEIS/FEIR, which includes an analysis of a PPP exemption program for small air service communities. The analysis shows that the carefully crafted exemption program maintains service to small communities without diluting the overall delay reduction benefits of the PPP option.
98.21	Alternatives	Runway 14/32	... the new runway would allow Logan to handle 120 flights per hour *more of the time*, ... The extent of this proposed increase in capacity must be studied and its environmental impacts, both airside and groundside, analyzed.	Logan Airport's normal airfield capacity is approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. Refer to Section 4.6 of the Supplemental DEIS/FEIR for a discussion of the operational benefits of the Preferred Alternative and to Chapter 6 of the Supplemental DEIS/FEIR for a discussion of environmental impacts of Preferred Alternative.
98.22	Analysis Assumptions/ Methodologies	Delay Model	[Request] a more sophisticated presentation of the causes of delay at Logan.	Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project is designed to reduce delays at Logan Airport from adverse winds and taxiway congestion by addressing constraints at Logan Airport. Delays caused by conditions at other airports or other factors, such as mechanical failure, are not addressed since Massport cannot influence these delays. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a discussion of the FAA and U.S. DOT measures of delay and historical data, along with comparisons of Logan Airport with other United States airports.

Code	Topic 1	Topic 2	Comment	Response
98.23	Environmental Justice	Demographic Data	[Concerned about] the absence of any substantive environmental justice analysis ...	Refer to Section 6.8 of the Supplemental DEIS/FEIR for a discussion of the Environmental Justice analysis. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order r, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.
98.24	Noise	Open Space/ Parkland	The discussion of impacts of the proposed airside improvements on the Boston Harbor islands is inadequate.	The Boston Harbor Islands, while within the No Action Alternative (Alternative 4) 65 dB Day-Night Sound Level (dB DNL) contour, will have no noise increase with the Preferred Alternative. Refer to Section 6.3.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative.
98.25	Ecosystems	Rare Species	This plan may be adequate but it should be fully aired prior to its inclusion in a Final EIR/S.	The concept mitigation plan presented in the Airside Project Draft EIS/EIR has evolved through discussions between Massport, the Massachusetts Natural Heritage and Endangered Species Program (MNHESP) and the Massachusetts National Guard. Based upon this coordination, Massport has developed a MOU with Massachusetts National Guard for long-term management of the mitigation site at Camp Edwards once Massport has funded the initial grassland restoration project. Furthermore, MNHESP has issued a draft Conservation and Management Permit incorporating permit conditions. Copies of the MOU and the draft permit are contained in Appendix E of the Supplemental DEIS/FEIR.
98.26	Analysis Assumptions/ Methodologies	Air Quality Model	The air quality analysis in the DEIS/R has serious deficiencies, as demonstrated by the comments of Dr. Henry S. Cole....effects of particulate matter with a diameter of less than 2.5 microns ...	Particulate Matter (PM) emission factors for aircraft are very limited, at best, and nonexistent in most cases. Therefore, as a conservative, worst-case assumption, the air quality analysis assumed that all PM is less than ten microns in diameter. No emission factors or approximation methods are available for PM 2.5.
98.27	Environmental Review Process	MEPA	... a Supplemental Draft Environmental Impact Statement/Report is warranted.	Refer to response to Comment 98.4.

Construction and General Laborers' Union Local 22

280 MEDFORD STREET, MALDEN, MA 02148 • Tel. (781) 321-6616 • Fax (781) 321-6662

Danny Cimino
President
Field Representative

Louis A. Mandarini, Jr.
Business Manager
Secretary Treasurer

Dominic Ottaviano
Field Representative

April 22, 1999

LETTER 99

Secretary of Environmental Affairs
Attn: MEPA Office
Mr. Arthur Pugsley - EOEA No. 10458
100 Cambridge St., 20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

Laborers' Local 22 is writing today in full support of Massachusetts Port Authority's Airside Improvement plan for Logan International Airport. Local 22 firmly believes that this project is necessary to reduce delays, improve the quality of life of our members and provide much needed employment opportunities.

Delays at Logan are consistently among the worst in the United States. These delays are not only inconvenient, they are costly. In 1998 delays at Logan cost airlines and their passengers nearly $310 million. These losses ultimately affect the livelihood of many working men and women as it impedes the ability of Boston and the region to compete in a global economy.

A major component of the Airside Improvement project, Runway 14/32, provides significant noise relief for our members living in the highest impacted noise areas of East Boston's Bayswater, Revere's Beachmont and Winthrop's Court Road and Point Shirley as well as South Boston's Castle Island area. The new unidirectional Runway shifts 75,000 flights over the water rather than other communities. The proposed centerfield taxiway and other improvements would further enhance air quality by reducing aircraft idling and queuing on the airfield and reduce ground noise from taxying aircraft to adjacent neighborhoods.

99.1
99.2
99.3

With an annual economic impact of $5 billion, Logan International Airport is directly responsible for creating more than 15,000 jobs in this area, many of which are the hard working men and women of Laborers' Local 22.

It is therefore, without reservation, that Laborers' Local 22 wholeheartedly supports Airside Improvements at Logan Airport and eagerly looks forward to the project's approval.

Thank you for your attention to this matter.

Sincerely yours,

Louis A. Mandarini, Jr.

Louis A. Mandarini, Jr.
Business Manager

LAM/ls

Letter 99
Construction and General Laborers' Union Local 22
Louis A. Mandarini Jr., Business Manager

Code	Topic 1	Topic 2	Comment	Response
99.1	Noise	Runway 14/32	...Runway 14/32, provides significant noise relief for our members living in the highest impacted noise areas of East Boston's Bayswater, Revere's Beachmont and Winthrop's Court Road and Point Shirley as well as South Boston's Castle Island area.	Comment noted.
99.2	Noise	Runway 14/32	The new unidirectional Runway shifts 75,0000 flights over the water rather than other communities.	Comment noted.
99.3	Alternatives	Taxiway Improvement	The proposed centerfield taxiway and other improvements would further enhance air quality....	Comment noted.

Continental Airlines, Inc
Newark International Airport
Newark NJ 07114

LETTER 100

Please respond to:

38 New Hampshire AV
Massapequa, NY 11758

April 16, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley – EOEA No. 10458
100 Cambridge Street
20th floor
Boston, MA 02202

SUBJECT: Logan Airside Improvements Planning Project
Boston-Logan International Airport

REFERENCE: Draft EIS/EIR

Dear Sir:

These comments are submitted by Continental Airlines and supplement and expand upon the statement made at the April 8, 1999, public hearing on the subject project held at the Holiday Inn, 225 McClellan Highway, E Boston, MA.

My name is Glenn Morse. I am Senior Director, Industry Affairs, for Continental Airlines. Prior to joining Continental Airlines 14 months ago, I served as Managing Director, Regional Operations, for the Air Transport Association. ATA is the trade association for all the major US passenger and cargo airlines. In my role with ATA, I worked closely with FAA and Massport to implement environmentally acceptable air traffic and airport improvements to reduce the historically high level of delays at Logan. As a result of this involvement, Massport asked me to co-chair the Airside Review Committee which was formed to insure active and extensive community involvement in the planning and environmental processes associated with the Logan Airside Improvements Planning Project.

The Airside Review Committee was comprised of community and business representatives and served as a technical liaison between Massport and the many diverse constituencies around Logan.

In order to further assist the community in the review process, Massport allocated funds to the Logan Community Advisory Committee (CAC) for an independent consultant to analyze and critique the technical results of this study. It is important to note that the CAC's consultant did not dispute and, in fact, accepted Massport's technical findings on the operational benefits and environmental analysis which serve as the basis for this environmental documentation. (See Attachment 1, excerpt from COMMUNITY ADVISORY COMMITTEE POSITION STATEMENT RE MASSPORT'S AIRSIDE IMPROVEMENT PROJECT PROPOSALS, April 9, 1997, to Peter Blute, Executive Director, Massport).

The purpose of this introduction is to describe briefly the extensive coordination process which Massport used to foster understanding of the various components of the proposed Logan Airside Improvement Project.

Continental Airlines supports implementation of all of the airfield improvements and the instrument approach minimums reductions contained in Massport's preferred improvement Alternative 1A. 100.1

Alternative 1A consists of:

Unidirectional Runway 14/32
Midfield taxiway
Minimums reductions for Runways 15R and 33L, 22L and 27
Extension Taxiway D
Realignment of Taxiway N
Southwest taxiway optimization

For the record, we concur with Massport's decision to exclude implementation of peak hour pricing from the preferred alternative at this time because of its limited delay reduction benefit as identified in the Draft EIR/EIS; its adverse economic impacts; and a firm belief that it does not address the primary causes of delay at Logan —wind and weather. 100.2

We support all of the taxiway improvements, most importantly the midfield taxiway, because they will enhance the safety and efficiency of aircraft movements on the airport. These efficiency gains translate to environmental benefits as stated in the Draft EIR/EIS because they reduce taxi times and consequently reduce the engine and noise emissions associated with taxiing aircraft. 100.3

We support the reduction of minimums as proposed because these operational improvements will enhance the safety of our operations, increase the reliability of our operations, and reduce the adverse environmental consequences of unnecessary missed 100.4

approaches and the delays and airborne holding that result. In some circumstances it may also give the tower the ability to change arrival runways to reduce dwell and/or persistence, and better achieve PRAS goals.

Finally, Continental supports the construction of unidirectional Runway 14/32. Everyone acknowledges that 14/32 is not a silver bullet for all of the delays that occur at Logan. However, in good weather, when the winds are from the northwest, there is typically only one arrival runway, Runway 33L. This causes extraordinary arrival delays and holding. When the winds are very strong, all of Logan's traffic must use a single runway for arrival and departure, and delays can exceed four hours. This has been a problem at Logan in the past, is a problem now, and will continue to be a problem in the future regardless of the growth in passengers or operations. 100.5

The new runway, as proposed by Massport, will eliminate most of these delays and their adverse impact on the communities around Logan. Contrary to the assertions of those opposed to the runway, Runway 14/32 does not increase "the overall capacity" of the airport: it does increase the arrival capacity of the Runway 27/33L configuration in good weather to the level achievable with the other two primary configurations of Runways 4L/R and 9, and 22L/R and 27. 100.6

The delays which occur when the airport operates on the Runway 27/33L configuration during heavy traffic periods cause adverse impacts on the communities around Logan in the following ways: 100.7

1. Late flights arrive and depart later in the evening during more noise sensitive hours and are exempt from Massport's existing noise rules.

2. Aircraft holding to land increase noise and emissions over communities around the airport.

3. Finally, and probably most important, these delays cause the tower to use the higher capacity "north/south" runway configurations more frequently. This has occurred in the past, and as the Draft EIS/EIR states – will occur more frequently in the future as traffic increases. (See Draft EIS/EIR Figure 4.5-3, "Jet Overflights by Operating Direction are more Balanced with Runway 14/32," page 4-38).

   The following discussion expands on this last point:

   In order to mitigate the delays which occur in northwest wind conditions, the FAA uses other runway combinations with greater arrival capacity. This increases noise impacts in the communities north and south of the airport affected by those runways, and ultimately prevents FAA and Massport from achieving long standing, community supported runway use goals. The attached runway use statistics for turbojet aircraft compiled by Massport for the period 1980 through 1997 clearly show this preference for a higher capacity runway configuration

starting in 1992. This was precipitated by the worsening delay situation during northwest wind conditions at Logan. FAA statistics show that delays at Logan per 1,000 operations increased progressively from 32.8 in 1991 to 34.6 in 1992 and peaked at 39.2 in 1993.

The four pertinent statistics are:

Runway 33L arrivals
Runway 27 departures
Runway 4R arrivals
Runway 9 departures

Prior to 1992, average annual use for these operations was:

Runway 33L - Approximately 30% annually and never less than 25%,
Runway 27 - Approximately 18% annually and never less than 14.1%, which occurred in 1986, when the runway was closed for approximately six weeks for rehabilitation,
Runway 4R - Approximately 31% and never more than 37.3%,
Runway 9 - Approximately 22% and never more than 26.4%.

Beginning in 1992, in order to reduce delays, the tower began to use Runway 4R for arrival (with Runway 4L) and Runways 9 and 4R for departure in lieu of Runway 33L for arrival and Runway 27 for departure. As a result, the use of Runway 27 for departure dropped to 10%, hit a significant low of 4% in 1993, and has averaged 12% since 1992. Similarly, Runway 33L arrivals dropped to 17% in 1992, and hit a low of 15% in 1993, and have averaged less than 20% since 1992. Runway 4R arrivals increased to a high of 44% in 1993, and have averaged 40% since 1992, and Runway 9 departures increased to 31% in 1992, and 33% in 1993, and have averaged over 30% annually since 1992.

The FAA continues to use the higher capacity "north/south" configurations in order to reduce delay and improve airport efficiency.

100.8

In conclusion, at current or any future traffic levels, Runway 14/32 limited to unidirectional use provides safety, capacity and environmental benefits and reduces delays when winds are out of the northwest and contributes to the achievement of existing runway use goals.

Continental believes the draft EIR/EIS adequately addresses all of the critical environmental and operational issues associated with this important airport improvement program and reaches the most beneficial conclusion for the users of Logan Airport, the communities around the airport, the City of Boston, and the State of Massachusetts. That conclusion is a recommendation to adopt Alternative 1A including the construction of unidirectional Runway 14/32 as the preferred development alternative.

Thank you for the opportunity to comment.

Sincerely,

Glenn Morse
Senior Director
Industry Affairs

Attachments (2)

cc: B. Desrosiers, Massport
T. J. Kinton, Massport

throughout the surrounding affected communities. It is not enough to formally review, decide and mitigate or compensate for aspects of a particular project. Each change must be regarded as an opportunity and a reason to reassess the totality of Logan's impacts, and to readdress them as constructively as possible. Proposed changes do not happen in a vacuum; they accumulate individually into the totality of the whole picture of impacts.

In the case at hand, Massport's stated rationale for proposing the "Airside Improvements Project" is to reduce operational delays to carriers and passengers resulting from conditions and facilities, or lack thereof, at Logan. You must see that the residential communities lying in Logan's shadow do not care about the impacts of delays upon the traveling public (which include themselves) or their air carriers, except to the extent that those delays may cause increased impacts on those communities.

Our responsibility, as the CAC, is to seek improvements in environmental conditions, both overall and in each community. It follows then that our reactions will often differ from those of the business sectors, those having been ably represented on the Airside Review Committee. The role of the CAC, whether as part of the ARC, or independently, is to study and discuss the materials presented and otherwise available data bearing on the issues, and to advise the ARC and Massport regarding community concerns.

We appreciate having been afforded some means of conducting independent reviews, and while we were excluded in the initial process and should have been involved earlier, what was done cannot be undone. The information presented and the manner of presentation has been very helpful in understanding the details of the proposals and the concerns and objectives of the project proponents. Our consultant team has been provided reasonable opportunities to further explore the analyses conducted by your staff and consultants as well.

Massport's consultants have presented information and analyses which depict the proposed project elements as being of value in reducing operational delays to aircraft operations, and their being essentially benign or even environmentally beneficial given certain critical assumptions. Our consultants have advised us that on the technical level those analyses and evaluations are rational and competently performed, and that the data upon which they are based are reasonable.

You must understand, however, that those analyses, and the measures of impact which are employed, while inarguably "state of the art", do not reflect our real world experience over the days, nights and years of "living with Logan". We use the unquantifiable but very real "misery index", a reflection of the cumulative impacts of extended periods of near-constant noise bombardment, interrupted sleep and relaxation, smell, soot and concern for safety.

Are things getting better? Individual aircraft are quieter and cleaner but there are so

RUNWAY 4R ARRIVAL USE PERCENTAGE BY MONTH AND YEAR (1980-1997)
(Turbo-Jet Arrival Operations)

MONTH	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997
JAN	24.0%	13.0%	10.0%	20.0%	25.2%	15.2%	12.2%	17.0%	10.7%	10.0%	20.0%	20.0%	24.0%	53.0%	37.0%	37.0%	35.0%	25.0%
FEB	12.0%	27.0%	37.0%	35.0%	33.0%	23.1%	35.4%	11.1%	22.4%	37.0%	23.0%	27.0%	31.0%	42.0%	20.0%	26.0%	30.0%	26.0%
MAR	24.0%	29.0%	34.0%	45.0%	30.0%	24.4%	32.6%	50.5%	24.5%	49.0%	22.0%	30.0%	34.0%	58.0%	53.0%	57.0%	32.0%	30.0%
APR	73.0%	10.0%	14.0%	35.0%	49.0%	27.6%	61.5%	65.4%	52.2%	33.0%	12.0%	39.0%	42.0%	50.0%	24.0%	43.0%	41.0%	41.0%
MAY	42.0%	40.0%	65.0%	35.0%	20.0%	42.1%	46.6%	44.0%	61.4%	44.0%	31.0%	30.0%	61.0%	40.0%	35.0%	44.0%	30.0%	23.0%
JUN	27.0%	17.0%	01.0%	39.0%	35.0%	29.1%	32.7%	47.0%	36.6%	52.0%	20.0%	26.0%	20.0%	22.0%	24.0%	52.0%	40.0%	40.0%
JUL	21.0%	42.0%	33.0%	25.0%	21.0%	24.1%	41.9%	40.0%	44.2%	35.0%	30.0%	26.0%	17.0%	20.0%	30.0%	34.0%	20.0%	43.0%
AUG	39.0%	49.0%	10%	36.0%	46.1%	42.7%	30.4%	41.0%	38.4%	31.0%	49.0%	21.0%	20.0%	51.0%	39.0%	55.0%	48.0%	52.0%
SEP	35.0%	40.0%	50.0%	23.0%	20.1%	41.1%	32.6%	38.6%	20.0%	43.0%	30.0%	32.0%	30.0%	55.0%	44.0%	52.0%	56.0%	43.0%
OCT	24.0%	38.0%	36.0%	30.0%	37.6%	24.5%	30.0%	26.5%	36.9%	31.0%	22.0%	43.0%	37.0%	40.0%	45.0%	24.0%	33.0%	50.0%
NOV	7.0%	33.0%	26.0%	22.0%	15.4%	40.7%	24.9%	33.7%	13.6%	14.0%	9.0%	45.0%	61.0%	45.0%	25.0%	35.0%	37.0%	43.0%
DEC	12.0%	19.0%	22.0%	17.0%	22.0%	10.5%	31.1%	20.3%	17.6%	16.0%	12.0%	29.0%	65.0%	39.0%	47.0%	38.0%	30.0%	29.0%
Year	26.4%	30.0%	33.0%	31.0%	33.5%	29.5%	34.3%	37.3%	30.8%	33.0%	25.0%	30.0%	37.0%	44.0%	42.0%	41.0%	38.0%	36.0%

ANNUAL AVERAGE USE

APPROXIMATELY 31% PRIOR TO 1992.

USE INCREASED TO 40% ANNUALLY TO REDUCE DELAYS

RUNWAY 4R ARRIVAL USE PERCENTAGE BY MONTH AND YEAR (1980-1997)
(Turbo-Jet Arrival Operations)

MONTH	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997
JAN	24.0%	13.0%	10.0%	20.0%	25.2%	15.2%	12.2%	17.0%	10.7%	10.0%	20.0%	20.0%	24.0%	33.0%	37.0%	37.0%	35.0%	25.0%
FEB	12.0%	27.0%	37.0%	35.0%	33.0%	23.1%	35.4%	11.1%	22.4%	37.0%	23.0%	27.0%	31.0%	42.0%	20.0%	26.0%	30.0%	26.0%
MAR	24.0%	29.0%	34.0%	45.0%	38.0%	24.4%	32.8%	50.5%	24.5%	49.0%	22.0%	30.0%	34.0%	50.0%	53.0%	57.0%	32.0%	30.0%
APR	73.0%	10.0%	14.0%	35.0%	49.0%	27.0%	51.5%	66.4%	52.2%	33.0%	12.0%	39.0%	42.0%	50.0%	24.0%	43.0%	41.0%	41.0%
MAY	42.0%	40.0%	65.0%	35.0%	20.0%	42.1%	45.6%	44.0%	61.4%	44.0%	31.0%	30.0%	61.0%	40.0%	55.0%	44.0%	30.0%	23.0%
JUN	27.0%	17.0%	01.0%	30.0%	35.0%	29.1%	32.7%	47.0%	30.0%	52.0%	20.0%	20.0%	20.0%	22.0%	24.0%	52.0%	40.0%	40.0%
JUL	21.0%	42.0%	53.0%	25.0%	21.0%	24.1%	41.9%	40.0%	44.2%	35.0%	38.0%	26.0%	17.0%	20.0%	39.0%	34.0%	20.0%	43.0%
AUG	39.0%	49.0%	1.0%	36.0%	46.1%	42.7%	30.4%	41.0%	30.4%	31.0%	49.0%	21.0%	28.0%	51.0%	39.0%	55.0%	48.0%	52.0%
SEP	35.0%	40.0%	50.0%	23.0%	20.1%	41.1%	32.6%	38.6%	20.0%	45.0%	30.0%	32.0%	30.0%	55.0%	44.0%	52.0%	56.0%	43.0%
OCT	24.0%	38.0%	36.0%	30.0%	37.6%	24.5%	30.8%	26.5%	30.0%	31.0%	22.0%	43.0%	37.0%	40.0%	45.0%	24.0%	33.0%	50.0%
NOV	7.0%	33.0%	26.0%	22.0%	15.4%	40.7%	24.9%	33.7%	13.6%	14.0%	9.0%	45.0%	61.0%	45.0%	25.0%	35.0%	37.0%	43.0%
DEC	12.0%	19.0%	22.0%	17.0%	22.0%	19.5%	31.1%	20.3%	17.6%	16.0%	12.0%	29.0%	53.0%	39.0%	47.0%	38.0%	38.0%	29.0%
Year	26.4%	30.0%	33.0%	31.0%	33.5%	29.5%	34.3%	37.3%	30.6%	33.0%	25.0%	30.0%	37.0%	44.0%	42.0%	41.0%	38.0%	36.0%

ANNUAL AVERAGE USE APPROXIMATELY 31% PRIOR TO 1992.

USE INCREASED TO 40% ANNUALLY TO REDUCE DELAYS

RUNWAY 4R ARRIVAL USE PERCENTAGE BY MONTH AND YEAR (1980-1997)
(Turbo-Jet Arrival Operations)

MONTH	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997
JAN	24.0%	13.0%	16.0%	20.0%	25.2%	15.2%	12.2%	17.0%	10.7%	16.0%	20.0%	20.0%	24.0%	53.0%	37.0%	37.0%	35.0%	25.0%
FEB	12.0%	27.0%	37.0%	35.0%	33.0%	23.1%	35.4%	11.1%	22.4%	37.0%	23.0%	27.0%	31.0%	42.0%	20.0%	26.0%	30.0%	20.0%
MAR	24.0%	29.0%	34.0%	45.0%	39.0%	24.4%	32.6%	50.5%	24.3%	49.0%	22.0%	30.0%	34.0%	50.0%	24.0%	43.0%	41.0%	30.0%
APR	73.0%	10.0%	14.0%	35.0%	49.0%	27.0%	61.5%	65.4%	52.2%	35.0%	12.0%	39.0%	42.0%	50.0%	36.0%	44.0%	36.0%	23.0%
MAY	42.0%	40.0%	65.0%	35.0%	20.0%	42.1%	46.6%	44.0%	61.4%	44.0%	31.0%	30.0%	61.0%	40.0%	24.0%	52.0%	40.0%	40.0%
JUN	27.0%	17.0%	61.0%	39.0%	35.0%	29.1%	32.7%	47.0%	30.0%	52.0%	26.0%	26.0%	20.0%	22.0%	39.0%	34.0%	28.0%	43.0%
JUL	21.0%	42.0%	33.0%	25.0%	21.0%	24.1%	41.9%	40.0%	44.2%	35.0%	38.0%	26.0%	17.0%	20.0%	51.0%	39.0%	48.0%	52.0%
AUG	39.0%	49.0%	1.0%	36.0%	46.1%	42.7%	36.4%	41.0%	30.4%	31.0%	49.0%	21.0%	26.0%	51.0%	55.0%	44.0%	50.0%	43.0%
SEP	35.0%	40.0%	50.0%	21.0%	20.1%	41.1%	32.6%	30.6%	20.0%	43.0%	30.0%	32.0%	30.0%	55.0%	44.0%	52.0%	56.0%	50.0%
OCT	24.0%	38.0%	36.0%	30.0%	37.6%	24.5%	30.8%	26.5%	30.9%	31.0%	22.0%	43.0%	37.0%	40.0%	45.0%	24.0%	33.0%	43.0%
NOV	7.0%	33.0%	26.0%	22.0%	15.4%	40.7%	24.9%	33.7%	13.6%	14.0%	9.0%	45.0%	61.0%	46.0%	25.0%	35.0%	37.0%	29.0%
DEC	12.0%	19.0%	22.0%	17.0%	22.0%	10.5%	31.1%	20.3%	17.6%	16.0%	12.0%	29.0%	53.0%	39.0%	47.0%	38.0%	36.0%	36.0%
Year	26.4%	30.0%	33.0%	31.0%	33.5%	29.5%	34.3%	37.3%	30.6%	33.0%	25.0%	30.0%	37.0%	44.0%	42.0%	41.0%	38.0%	36.0%

ANNUAL AVERAGE USE APPROXIMATELY 31% PRIOR TO 1992.

USE INCREASED TO 40% ANNUALLY TO REDUCE DELAYS

RONWAY 4R ARRIVAL USE PERCENTAGE BY MONTH AND YEAR (1980-1997)
(Turbo-Jet Arrival Oporations)

MONTH	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997
JAN	24.0%	13.0%	10.0%	20.0%	25.2%	15.2%	12.2%	17.0%	10.7%	10.0%	20.0%	20.0%	24.0%	53.0%	37.0%	37.0%	35.0%	25.0%
FEB	12.0%	27.0%	37.0%	35.0%	33.0%	23.1%	35.4%	11.1%	22.4%	37.0%	23.0%	27.0%	31.0%	42.0%	20.0%	20.0%	30.0%	20.0%
MAR	24.0%	29.0%	34.0%	43.0%	39.0%	24.4%	32.8%	60.5%	24.5%	49.0%	22.0%	30.0%	34.0%	50.0%	53.0%	57.0%	32.0%	30.0%
APR	73.0%	10.0%	14.0%	35.0%	49.0%	27.0%	51.5%	65.4%	52.2%	33.0%	12.0%	39.0%	42.0%	50.0%	24.0%	43.0%	41.0%	41.0%
MAY	42.0%	40.0%	65.0%	35.0%	20.0%	42.1%	46.6%	44.0%	61.4%	44.0%	31.0%	30.0%	64.0%	40.0%	35.0%	44.0%	30.0%	23.0%
JUN	27.0%	17.0%	61.0%	39.0%	35.0%	29.1%	32.7%	47.0%	36.6%	52.0%	20.0%	20.0%	20.0%	22.0%	24.0%	52.0%	40.0%	40.0%
JUL	21.0%	42.0%	33.0%	25.0%	21.0%	24.1%	41.9%	40.0%	44.2%	35.0%	38.0%	28.0%	17.0%	20.0%	39.0%	34.0%	20.0%	43.0%
AUG	39.0%	49.0%	1.0%	36.0%	40.1%	42.7%	38.4%	41.0%	38.4%	31.0%	49.0%	21.0%	26.0%	51.0%	39.0%	55.0%	48.0%	52.0%
SEP	35.0%	40.0%	50.0%	23.0%	20.1%	41.1%	32.6%	38.6%	20.0%	43.0%	30.0%	32.0%	30.0%	55.0%	44.0%	52.0%	56.0%	43.0%
OCT	24.0%	38.0%	36.0%	38.0%	37.6%	24.5%	38.8%	26.5%	38.9%	31.0%	22.0%	43.0%	37.0%	40.0%	45.0%	24.0%	33.0%	50.0%
NOV	7.0%	33.0%	26.0%	22.0%	15.4%	48.7%	24.9%	33.7%	13.6%	14.0%	9.0%	45.0%	61.0%	45.0%	25.0%	35.0%	37.0%	43.0%
DEC	12.0%	19.0%	22.0%	17.0%	22.0%	19.5%	31.1%	20.3%	17.6%	16.0%	12.0%	29.0%	50.0%	39.0%	47.0%	38.0%	38.0%	29.0%
Year	26.4%	30.0%	33.0%	31.0%	33.5%	29.6%	34.3%	37.3%	30.8%	33.0%	25.0%	30.0%	37.0%	44.0%	42.0%	41.0%	38.0%	36.0%

ANNUAL AVERAGE USE

APPROXIMATELY 31%

PRIOR TO 1992.

USE INCREASED TO 40% ANNUALLY TO REDUCE DELAYS

RUNWAY 4R ARRIVAL USE PERCENTAGE BY MONTH AND YEAR (1980-1997)
(Turbo-Jet Arrival Operations)

MONTH	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997
JAN	24.0%	13.0%	10.0%	20.0%	25.2%	15.2%	12.2%	17.0%	10.7%	10.0%	20.0%	20.0%	24.0%	53.0%	37.0%	37.0%	35.0%	25.0%
FEB	12.0%	27.0%	37.0%	35.0%	33.0%	23.1%	35.4%	11.1%	22.4%	37.0%	23.0%	27.0%	31.0%	42.0%	20.0%	26.0%	30.0%	26.0%
MAR	24.0%	29.0%	34.0%	43.0%	39.0%	24.4%	32.8%	50.5%	24.3%	49.0%	22.0%	30.0%	34.0%	50.0%	53.0%	57.0%	32.0%	30.0%
APR	73.0%	10.0%	14.0%	35.0%	49.0%	27.8%	51.5%	65.4%	52.2%	35.0%	12.0%	39.0%	42.0%	50.0%	24.0%	43.0%	41.0%	41.0%
MAY	42.0%	40.0%	65.0%	35.0%	20.0%	42.1%	46.6%	44.0%	61.4%	44.0%	31.0%	30.0%	61.0%	40.0%	35.0%	41.0%	30.0%	23.0%
JUN	27.0%	17.0%	61.0%	39.0%	35.0%	29.1%	32.7%	47.0%	36.6%	52.0%	20.0%	20.0%	20.0%	22.0%	24.0%	52.0%	40.0%	40.0%
JUL	21.0%	42.0%	33.0%	25.0%	21.0%	24.1%	41.9%	40.0%	44.2%	35.0%	38.0%	26.0%	17.0%	20.0%	30.0%	34.0%	20.0%	43.0%
AUG	39.0%	49.0%	1.0%	36.0%	40.1%	42.7%	30.4%	41.0%	30.4%	31.0%	49.0%	21.0%	26.0%	51.0%	30.0%	55.0%	48.0%	52.0%
SEP	35.0%	40.0%	50.0%	23.0%	20.1%	41.1%	32.6%	30.0%	20.0%	43.0%	30.0%	32.0%	30.0%	55.0%	44.0%	52.0%	50.0%	43.0%
OCT	24.0%	38.0%	36.0%	30.0%	37.6%	24.5%	30.0%	26.5%	36.9%	31.0%	22.0%	43.0%	37.0%	40.0%	45.0%	24.0%	33.0%	50.0%
NOV	7.0%	33.0%	26.0%	22.0%	15.4%	40.7%	24.0%	33.7%	13.6%	14.0%	9.0%	45.0%	61.0%	45.0%	25.0%	35.0%	37.0%	43.0%
DEC	12.0%	19.0%	22.0%	17.0%	22.0%	10.5%	31.1%	20.3%	17.6%	16.0%	12.0%	29.0%	53.0%	39.0%	47.0%	38.0%	36.0%	29.0%
Year	26.4%	30.0%	33.0%	31.0%	33.5%	29.5%	34.3%	37.3%	30.6%	33.0%	25.0%	30.0%	37.0%	44.0%	42.0%	41.0%	38.0%	36.0%

ANNUAL AVERAGE USE APPROXIMATELY 31% prior to 1992.

USE INCREASED TO 40% ANNUALLY TO REDUCE DELAYS

Letter 100
Continental Airlines, Inc.
Glen Morse, Senior Director, Industry Affairs

Code	Topic 1	Topic 2	Comment	Response
100.1	Alternatives	Preferred Alternative	...supports implementation of all of the airfield improvements and the instrument approach minimums reductions contained in Massport's preferred improvement Alternative 1A.	Comment noted.
100.2	Alternatives	Peak Period Pricing	...we concur with Massport/s decision to exclude implementation of peak hour pricing from the preferred alternative at this time....	Comment noted.
100.3	Alternatives	Taxiway Improvements	We support all of the taxiway improvements, most importantly the midfield taxiway, because they will enhance the safety and efficiency of aircraft movements....	Comment noted.
100.4	Alternatives	Reduced Approach Minima	We support the reduction of minimums as proposed...In some circumstances it may also give the tower the ability to change arrival runways to reduce dwell and/or persistence, and better achieve PRAS goals.	Comment noted.
100.5	Alternatives	Runway Use	...Continental supports the construction of unidirectional Runway 14/32...when the winds are from the northwest, there is typically only one arrival runway, Runway 33L...This has been a problem at Logan in the past, is a problem now, and will continue to be a problem in the future regardless of the growth in passengers or operations.	Comment noted.
100.6	Alternatives	Runway 14/32	...Runway 14/32 does not increase "the overall capacity" of the airport....	Comment noted.
100.7	Purpose and Need	Delays	The delays which occur when the airport operates on the Runway 27/33L configuration during heavy traffic periods cause adverse impacts on the communities around Logan....	Northwest winds requiring the use of Runway 33L or 27/33L are a major source of Logan Airport's delays. Runway 14/32 would substantially reduce these delays and the resulting environmental impacts.
100.8	Alternatives	Runway Use	...at current or any future traffic levels, Runway 14/32 limited to unidirectional use provides safety, capacity and environmental benefits and reduces delays when winds are out of the northwest and contributes to the achievement of existing runway use goals.	Comment noted.

Delta Air Lines

LETTER 101

John Boatright
Vice President
Properties and Facilities

April 8, 1999

4/27/99
cc: B. Desrosiers
B. McMorrow
PMC
DM

Mr. Thomas J. Kinton, Jr.
Director of Aviation
Massachusetts Port Authority
One Harborside Drive, Suite 200S
East Boston, Massachusetts 02128-2909

Dear Tom:

This letter will serve as notice that Delta Air Lines is in support of the Airside Improvement Planning Projects as outlined in the Delay Reduction Program package proposed by Massport for Logan International Airport. In particular, the construction of the new uni-directional runway 14/32 would vastly improve the efficiency of the airfield during certain wind conditions and reduce the delays otherwise experienced when these conditions exist. During such times, the airport is constrained and must operate at a level far below the normal airfield capacity due to the lack of an efficient runway configuration needed to meet the operational requirements that are addressed by other runways in different wind conditions. 101.1

Along with the construction of the new runway, the other projects outlined in the Airfield Improvement Planning Projects package will provide for even greater efficiencies and benefit to the airport.

Respectfully,

cc: Mr. Danny Quillen, Delta Air Lines, Inc.
Mr. Harold Bevis, Delta Air Lines, Inc.
Mr. Dave Bushy, Delta Air Lines, Inc.
Mr. Larry Aldrich, Delta Air Lines, Inc.

Letter 101
Delta Airlines
John Boatright, Vice President, Properties and Facilities

Code	Topic 1	Topic 2	Comment	Response
101.1	Alternatives	Runway 14/32	...the construction of new uni-directional runway 14/32 would vastly improve the efficiency of the airfield during certain wind conditions and reduce the delays otherwise experienced when these conditions exist.	Comment noted.

Delta Air Lines

LETTER 102

Dave Bushy
Vice President
Flight Operations

May 7, 1999

Mr. Peter Blute
Executive Director and CEO
Massachusetts Port Authority
One Harborside Drive, Suite 200S
East Boston, MA 02128-2909

Dear Mr. Blute:

On behalf of the Delta Air Lines Flight Operations Department, I would like to express my support for the Logan Airside Improvements Project and the construction of a new uni-directional commuter runway as a key element in this major delay reduction initiative.

This new runway will play a major role in enhancing airport operations and reducing delays, particularly during strong northwest wind conditions which limit all aircraft operations to Runway 33L. These conditions result in frequent and often extensive delays that inconvenience our customers, disrupt our otherwise enviable on-time performance, and cost our company hundreds of thousands of dollars annually. My personal experiences as Chief Pilot for Delta in Boston provided me with first-hand knowledge of the need for this runway, as well as the fact that it will not increase noise to airport neighbors. 102.1

Construction of the new runway 14/32 will be a substantive investment in the future of the city of Boston and Logan Airport as a major gateway for air travel in the Northeastern United States. Delta Air Lines strongly recommends moving forward with the Airside Improvement plan.

Sincerely,

Dave Bushy

cc: Mr. Thomas Kinton, Director of Aviation—Massachusetts Port Authority
Mr. Scott Yohe, Senior Vice President—Government Affairs
Mr. Harold Bevis, Vice President—Public Affairs
Mr. John Boatright, Vice President—Properties & Facilities
Mr. Danny Quillen, General Manager—Public Affairs
Mr. Larry Aldrich, Regional Director—Properties & Facilities

Letter 102
Delta Airlines
David Bushy, Vice President, Flight Operations

Code	Topic 1	Topic 2	Comment	Response
102.1	Alternatives	Runway 14/32	This new runway will play a major role in enhancing airport operations and reducing delays, particularly during strong northwest wind conditions which limit all aircraft operations to Runway 33L.	Comment noted.

Eagle Hill
East Boston Eagle Hill Civic Association

Mr. Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

PO Box 512
Eagle Hill
East Boston, MA
02128

LETTER 103

March 12, 1999

Dear Mr. Durand,

As residents, tax-payers and homeowners in East Boston, we write to urge you to oppose Massport's proposed runway 14/32. According to Massport's EIS report, the runway will reduce delays only 20% of the time AND would be effective only until the year 2003, when delays at Logan will return to present levels. The permanent environmental damage that will be caused Boston residents cannot be justified by this shortsighted proposal. The Eagle Hill Civic Association has worked for the past 15 years to increase awareness about the historical and architectural value of Victorian homes on Eagle Hill, the most densely populated area of East Boston. Because of the work we have done renovating hundreds of homes and buildings, Eagle Hill is now listed on the National Registry of Historic Places and many middle class residents are choosing to move to Eagle Hill, thus building up the City's badly needed tax base. 103.1

Because 14/32 will increase flights on existing runways 27 and 33, residents of Eagle Hill *who already shoulder an unfair portion* of airport noise, fumes and traffic will be permanently and dangerously impacted with triple the amount of planes passing over our homes. This will be a particular danger for our children, as Eagle Hill has the highest concentration of children and schools in East Boston. With 14/32, operations on runway 27 (impacting Roxbury, South Boston, the South End, Dorchester, Jamaica Plain, Roslindale, West Roxbury and Brookline) will increase from 18,000 to 56,495 annually. Operations on runway 33 (affecting East Boston, Chelsea, Charlestown, Hull, Revere, Somerville, Cambridge, Winthrop, Melrose) will increase from 6,082 to over 21,000 annually. Yet, Massport continues to downplay these impacts as "environmentally insignificant." 103.2

Massport's EIS report doesn't mention that fact that *since 1992, delays at Logan have decreased.* This information is publicly available in the Federal Aviation Administration's 1998 ACE (Airport Enhancement Capacity) Report and on the website www.asc.faa.gov. The only reason that Massport can claim that Logan has a "delay problem," is because Massport uses unrealistically high "maximum capacity" goals. Airports such as Dallas or Denver, located on relatively unpopulated land can set higher maximum capacity numbers. Airports located in densely populated urban areas must accept the reality that maximum capacity goals have to be lower than those at airports in non-urban areas, due to environmental and health impacts on local residents. The only reason Massport calls itself a "high delay" airport is because they aim for 120 planes per hour as their maximum capacity. If their goals were set at a more realistic 90 planes per hour (used in other urban airports), Logan would not have a serious delay problem. 103.3

Massport's EIS represents the interests of airlines and airport-related businesses, all of whom stand to make big profits if Logan's overall capacity is increased by runway 14/32. The EIS does not consider health impacts environmental and quality of life issues of Boston's inner city residents. The EIS does not include the negative indemnity of real estate prices for the thousands of homes under the flight paths, nor increased crime and lost tax 103.4

- revenues for the City of Boston when middle class families are forced to move elsewhere because of the excessive plane noise and fumes. Although adequate testing has not been done, I don't believe it is a coincidence that many residents of East Boston are hard of hearing. Hundreds of thousands of people in Greater Boston need your support on this issue. Please reject Massport's EIS, work to keep the present court injunction in place and encourage Massport to seek alternative methods to handle projected air travel increases.

Significantly more flights should be directed to Hanscom Airport, located just 25 minutes from Boston and presently utilized at only a third of its capacity. Hanscom has the runway capacity *right now* to handle commercial commuter planes. Massport must designate Hanscom as a commercial commuter airport instead of a "small corporate jet" airport, as it is now classified. By increasing air traffic at Hanscom, Worcester, Manchester and Providence to the maximum capacity possible, Massport will avoid future delays at Logan with minimal negative impacts on Greater Boston residents who already receive the lion's share of negative impacts from regional air travel. **We desperately need airport impact relief for the existing noise and traffic, not additional negative impacts!** 103.

Another alternative which Massport has been unwilling to implement is Peak Hour Pricing, a demand management tool which is very successfully used in the hotel and tourism industry as well as the electric utility industry. For profit reasons, airlines prefer to increase capacity rather than manage demand. It is an injustice when greedy profit motives overrule the well-being of human beings. Massport has the opportunity to become a national leader in airport demand management and should give peak hour pricing a year-long trial implementation before proposing the construction of any new runways. 103.6

Massport claims to be a "good neighbor," yet they secretly met behind closed doors with representatives of the media and business sectors to garner their support before publicly announcing plans to build 14/32. *The Globe*, the *Herald* and most major TV networks came out in favor of the proposal even before the MEPA environmental impact report was published! Is this fair play? Is this being a good neighbor? Despite Massport's economic and political advantages, residents of East Boston and Greater Boston will fight this proposal by every means available. We hope we can count on your support.

Sincerely,

Debra L. Cave

Debra L. Cave, President
East Boston Eagle Hill Civic Association

Letter 103
East Boston Eagle Hill Association
Debra L. Cave, President

Code	Topic 1	Topic 2	Comment	Response
103.1	Purpose and Need	Delay Reduction	...the runway will reduce delays only 20% of the time AND would be effective only until the year 2003, when delays at Logan will return to present levels.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
103.2	Noise	Runway Use	...14/32 will increase flights on existing runways 27 and 33...operations on runway 27...will increase from 18,000 to 56,495 annually. Operations on runway 33...will increase from 6,082 to over 21,000 annually.	The Supplemental DEIS/FEIR projects that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals. The total number of departures from Runway 27 (over South Boston, Roxbury, and Jamaica Plain) would increase, but the number of equivalent jet operations would remain essentially the same. The difference in these communities would be fewer nighttime operations and more daytime operations but the same noise impacts. Total departures from Runway 33L and arrivals to Runway 15R (over East Boston and Chelsea) would increase, but most of these are non-jets. These runway operations are currently running well below the PRAS goals, and the unidirectional Runway 14/32 would allow the controllers to approach, but still remain below the annual goals for these operations. Additionally, by increasing the number of operations over water, Runway 14/32 would reduce the total annual hours of dwell and persistence over populated areas in accordance with short-term PRAS goals.
103.3	Delay	Model	Massport's EIS report doesn't mention that fact that since 1992, delays at Logan have decreased. If their goals were set at a more realistic 90 planes per hour (used in other urban airports), Logan would not have a serious delay problem.	The Supplemental DEIS/FEIR contains a discussion of the FAA and DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports. FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. Arrival delays, which would be directly affected by Runway 14/32, have risen steadily since 1994. Airfield capacity is a function of the runways in service, the fleet mix using them, prevailing weather conditions, and FAA air traffic control procedures. Massport cannot arbitrarily define the runway capacity and regulate airline schedules. The highest capacity configuration at Logan Airport today for three runways in good weather is about 120 operations per hour.

Volume1_DraftEIS\Appendix\Comments & Responses\Letter Groups_2.doc

Code	Topic 1	Topic 2	Comment	Response
103.4	Environmental Justice	Impacts	The EIS does not consider health impacts environmental and quality of life issues of Boston's inner city residents.	Massport has provided the City of Boston and public health agencies with air quality and emissions data. In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 *Report to the Mayor, Health of Boston* prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the *Soot Deposition Study* with public health agencies and is cooperating with the Harvard School of Public Health on the *South Boston Particle Source Apportionment Study*. Information on public health issues is provided in Chapter 6 of the Supplemental DEIS/FEIR.
103.5	Regional Alternatives	Regional Airports	...more flights should be directed to Hanscom Airport...By increasing air traffic at Hanscom, Worcester, Manchester and Providence to the maximum capacity possible, Massport will avoid future delays at Logan....	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport. With recent service developments, Manchester and T.F. Green/Providence airports, are becoming attractive alternatives for Logan Airport passengers that originate in communities north and south of Routes I-95 and I-495. By its agreement to assume operational responsibility and the eventual ownership of the Worcester Regional Airport, Massport is working to increase air services at Worcester Regional Airport and is working to increase the airport's role in accommodating air travel demand generated in communities west of I-95 and I-495. Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project is designed to reduce delays at Logan Airport from adverse winds and taxiway congestion.

Code	Topic 1	Topic 2	Comment	Response
103.6	Alternatives	Peak Period Pricing	Massport...should give peak hour pricing a year-long trial implementation before proposing the construction of any new runways.	The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR contain analysis of PPP as a demand management alternative at Logan Airport. PPP is not recommended for implementation at this time because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport is prepared to initiate a process, as described in Section 4.5.4 of the Supplemental DEIS/FEIR, to initiate the rule-making process to implement PPP at that time.

Vol4.pmf:LDR74.pm:Docs:Record:Renumbered Comments & Responses:Letters:Letter103_0.doc

LETTER 104

Eagle Hill
East Boston Eagle Hill Civic Association

PO Box 512
Eagle Hill
East Boston, MA
02128

Mr. Robert A. Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge St. Rm. 2000, Boston, MA 02202

April 8, 1999

Dear Mr. Durand,

The more we hear Massport and business sectors (most of whom do not live in Boston) promote runway 14/32, the angrier we get. Massport has misrepresented the truth and manipulated data to support the runway. **Massport's EIS is inadequate because it is based on 1993 figures** (a year that happened to be a record high for delays). According to the FAA (www.asc.faa.gov), delays at Massport are significantly lower today than in 1993. Frankly, nobody considered Massport an "extremely delayed" airport before Massport announced its plans to build runway 14/32. Over the last two months, pro-runway news stations and newspapers have regularly proclaimed that Logan is "notorious" for delays. Massport is engaging in an unfair and exaggerated propaganda war to increase anxiety about delays, something that nobody complained about before runway 14/32 was announced. 104.1

Because 1998 data shows that *Logan's delay situation is improving,* Massport chose to use 1993 statistics. Moreover, the EIS barely includes alternatives to 14/32, because Massport lacks the political WILL to implement alternatives. This violates MEPA regulations and renders the EIS invalid. We urge you to dismiss this biased document and consider the following points. **If Runway 14/32 is built,** it will not only TRIPLE the amount of environmental impacts for the worst affected communities, but **will remove incentive to immediately implement regional transportation planning. 14/32 will not solve the root causes of delays at Logan:**

#1 Small planes and corporate jets are allowed to land at Logan, delaying the take-offs and departures of large commuter carriers. Small planes and corporate jets should be sent to Hanscom Airport, which has the runway capacity and is ideally located for corporate commuters heading towards the 128 and 495 area. Yes, this will mean modest air traffic expansion for rural communities abutting Hanscom, but considering that the noise contour lines for Hanscom Airport fall on open fields and woods, no residential homes would receive noise decibel levels comparable in intensity to those suffered by hundreds of thousands of people around Logan. Expanding operations at Hanscom would mean that a relatively small number of residents would receive relatively small noise increases. Expansion at Logan means that hundreds of thousands of already impacted residents will receive very large noise increases. The justice issue is clear. Furthermore, businesses and tourism will flourish in Boston whether people land at Logan or 25 minutes to the West in Bedford. Massport didn't even *mention* this solution in its EIS. 104.2

#2 Logan has no major feeder airports. If you look at the airports that rank higher than or roughly the same as Logan in delays, you will note that ALL of them have two, three or more major feeder airports. San Francisco has SFO International, Oakland International and San Jose International all within 20-45 minutes of San Francisco. New York has Kennedy, La Guardia and Newark all within 30-45 minutes of town. If Massachusetts had a second international or national airport within an hour of Boston, imagine how quickly delays at Logan would go down! 104.3

#3 Massport sets unrealistic flight per hour goals, given its densely populated, urban surroundings. 120 planes per hour (24 hours per day!) should not be allowed. Were Massport to use the more realistic number of 90 planes per hour, Logan would have no delay problem. Abutters of Logan are in desperate need of noise relief, not noise increases. We sincerely hope that your agency will consider these issues and reject Massport's EIS. By doing so, Massport will receive a strong message that it needs to design a long-term, socially-responsible, regional air traffic plan for the 21st century. Thank you. 104.4

Debra L. Cave

Debra L. Cave, President
East Boston Eagle Hill Civic Association

Letter 104
East Boston Eagle Hill Association
Debra L. Cave, President

Code	Topic 1	Topic 2	Comment	Response
104.1	Analysis Assumptions/ Methodologies	Base Year	Massport's EIS in inadequate because it is based on 1993 figures...According to the FAA...delays at Massport are significantly lower today than in 1993...1998 data shows that Logan's delay situation is improving....	The Supplemental DEIS/FEIR provides updated information for 1998—the latest year for which actual Logan Airport data are available. 1993 was adopted as the base year when the Airside Improvement studies commenced in 1994. The primary function of the Base Year analysis is to calibrate the airfield operation models and environmental impact models. The benefits and impacts of the action alternatives (Alternatives 1, 1A, 2 and 3) are assessed by comparing these not with the base year, but with Alternative 4, the No-Action Alternative. The planning scenarios for 37.5 and 45 million passengers represent a range of future activity at Logan Airport expected in the 2010 to 2020 time frame. Analysis of 1981 to 90 weather with 1989-98 weather identifies no significant differences in statistical properties.
104.2	Regional Alternatives	Regional Airports	Small planes and corporate jets should be sent to Hanscom Airport....	Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations. In 1998, it accommodated 183,000 general aviation operations compared to 32,000 general aviation operations at Logan Airport. The Hanscom Field activity includes private, business, charter, and air-taxi operations that might otherwise use Logan Airport. While approximately 45 percent of commercial aircraft activity at Logan Airport is on small planes, Massport plays no role in the decisions of private airlines regarding air service routes or service levels. Airlines are unlikely to move a significant number of these flights to Hanscom Field, since approximately 50 percent of passengers on these flights connect to other flights operated at Logan Airport.
104.3	Regional Alternatives	Regional Airports	Logan has no major feeder airports...If Massachusetts had a second international or national airport within an hour of Boston, imagine how quickly delays at Logan would go down!	Because the development of a second major airport would require ten to 15 years for site selection and environmental review in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Service developments at other surrounding airports, including Manchester, T.F. Green/Providence and Worcester Regional airports, preclude the need for a second major airport.
104.4	Delay	Model	Massport set unrealistic flight per hour goals...Were Massport to use the more realistic number of 90 planes per hour, Logan would have no delay problem.	Airfield capacity is a function of the runways in service, the fleet mix using them, prevailing weather conditions, and FAA air traffic control procedures. Massport cannot arbitrarily define the runway capacity nor airline schedules. The highest capacity configuration at Logan Airport today for three runways in good weather is about 120 operations per hour. Proposed airside improvements, such as Runway 14/32, are intended to fill in the capacity gap which exists under some conditions such as northwest wind and to reduce delays at those times.

LETTER 105

Mr Arthur Pugsley, Reviewer

Exedcutive Office of Environmental Affairs

100 Cambridge Street

Boston Massachusetts 02202

RE:EOEA #10458

Dear Mr Pugsley:

These comments are submitted for the East Boston Land Use Advisory Council after duly noticed meetings and votes taken according to its by-laws. The Council is an East Boston community group, organized in 1968 and in continuous session since that time. The mission of the Council, hereinafter called LUC is to provide a forum and advocacy for zoning, licensing, recreational and planning issues which generally affect the quality of community life in East Boston and these comments are submitted in accordance with that mission and purpose.

The referenced Draft EIS/EIR has been submitted in support of Massachusetts Port Authority (MPA) proposal called Logan Airside Improvements Planning Project (the Project), and, after due consideration LUC has voted, on March 25, 1999 and April 1, 1999 to request the Secretary to reject this Document and the Project proposed thereby.

Statement of Proposal

The referenced document proposes that MPA build a runway, compass points 140/320 degrees, a centerfield taxiway, and, in the Federal submission, a reduced approach height minimum to 18' all proposals being for the purpose of claimed operation delay management and improved operation safety. Document specifically states that no increase in operation capacity is facilitated by the specific "airside improvements" and that the impacts of the "airside improvements" be considered and evaluated separately from previously proposed and implemented "groundside improvements"

Analysis of Proposal

LUC submits that the proposal overstates and fails to analyze correctly the delay situation at Boston-Logan International Airport and further states an inaccurate picture of delay trends and forecasts. The proposal is further flawed by failure to present and analyze alternative delay reduction strategies that would reduce

delays without implementing the runway/ taxiway build schemes and their accompanying environmental and economic impacts on the affected communities. These failures violate the requirements of both NEPA and MEPA requiring comparative alternative analysis to "build" and further, the requirement in both Acts to not "segment" the impacts of related components of a proposal such as "Groundside" and "Airside" which are clearly related in their cumulative impacts on the affected communities.

The argument of MPA that "Groundside" (passenger handling) and "Airside"(aircraft handling) are severable, and that neither, alone or cumulatively generates traffic and capacity expansion is, on its face, tenuous and based on assumptions that deny a reasonable view that these developments are closely related and necessarily cumulative in their environmental impacts. While it is true that MPA will not control passenger and cargo operation growth at Logan, the reasoning is not that such growth cannot be controlled and managed, but rather that to exercise such control would be contrary to the fundamental economic purposes of MPA's development. The growth of operations and ensuing revenues support MPA's financial strength and to limit this growth would impair MPA's revenue stream and, thus, its bond covenants. MPA will not take measures to limit or manage operation growth, and, from a strictly economic standpoint, should not do so. Applicable law, however, including National Environmental Policy Act of 1969, Department of Transportation Act of 1966 and Massachusetts Environmental Policy Act set a much broader scope of requirements for review of the Project's supporting off-documentation. Specifically, the following items should be required to be addressed in the Project documentation:

1. Discussion of diversion of cargo operations to off-airport the off-alternatives. 105.1

2. Considering the off-airport alternatives as separate scenario for evaluation in DEIS/DEIR process. 105.2

3. Evaluation of MPA-owned Hanscom Field as a reliever airport for general aviation operations, origin/destination regional non-jet traffic, and short-haul origin/destination jet traffic. 105.3

4. Consideration of #3 and other sitings for a second major Massachusetts Airport, with particular consideration of 1996 Executive Order relative to environmental justice. 105.4

5. Analysis of existing delays at Logan owing to specifically wind/weather effects and indirectly from delay at other airports. 105.5

LUC submits that such indirect delay will not be relieved by the Airside project, and should not be included in the alleged benefit thereof.

6. Documentation of history of PRAS (preferential runway assignment) as management tool and analysis of problems with implementation thereof. 105.6

The Secretary should determine that significant planning deficiencies exist in the DEIS/DEIR and a new Draft document(not an amended version) be submitted.

The "base year" of 1999 does not adequately reflect changes since that time, and a base of 1998 extending to 2020 should be required as proportionate to severity of impacts and to implement appropriate planning horizons. For example, delays at Logan have not significantly increased 1993 according to FAA modeling standards and therefore do not justify MPA's projections for future delays. Further, weather data does not allow for significantly changed weather conditions in the period from 1981-1990 to present. 105.7

Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations directly because of the sought-for effect of delay reduction. 105.8

The projected increases in passenger demand and capacity to handle such demand from the airside/groundside expansions will be met by increased "passenger jet" operations. The overflight impacts on 15/33 communities including East Boston will be disproportionate and the noise reduction benefits of stage 3 conversion are mostly already realized since only about 15% of the fleet remains to be made stage 3 compliant.

Further, the number of extremely noisy nighttime jet operations already required to be stage 3 compliant are seen to double in the foreseeable future and therefore no further noise reduction benefit whatsoever is to be derived on these increases.

Project documents tout the noise mitigation to be achieved through additional soundproofing treatment in impacted community. This benefit, such as it might be, will be disproportionately unavailable 105.9

In the poorer impacted communities because of the greater likelihood that residences will be non-compliant with relevant building codes and economic ability to achieve code-compliance is disproportionately lacking.

Alternatives to the build proposal are required to be " rigorously explored and evaluated" and alternatives, which were eliminated from detailed study, should be explained referencing briefly reasons for eliminating these alternatives. 105.10

The economic benefits of Logan are incorrectly conflated with those of Boston itself but the loss from the Boston-area impacts are conveniently neglected.

Boston worked best in a transportation environment predominantly emphasizing rail and water transport. The siting of Logan into preexisting urban areas was attempt to to gain advantage over other further-out airports. But the advantages gained, even temporarily thereby, have been constantly attended by disproportionately severe and unjust impacts. The current proposal is a clear and unfair extension of this bad history, and must be rejected to force a more rational approach to regional transportation solutions.

East Boston Land Use Advisory Council

By

Robert F. Strelitz

CC:Hon. Paul Scappicio

Letter 105
East Boston Land Use Advisory Council
Robert F. Strelitz

Code	Topic 1	Topic 2	Comment	Response
105.1	Regional Transportation	Cargo	Discussion of diversion of cargo operations to off-airport the off-alternative [should be discussed].	Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. The potential diversion of cargo operations was not specifically analyzed because cargo operations account for only two percent of aircraft activity at Logan Airport and since most all-cargo aircraft operate during off-peak hours, cargo operations do not contribute to delays at Logan Airport. However, all cargo operations were included in the future fleets analyzed in the Airside Project. Additionally, some cargo is now being diverted to regional airports as indicated by the strong growth in cargo services and air cargo activity at the regional airports.
105.2	Regional Transportation	Regional Alternatives	Considering the off-airport alternatives as separate scenario for evaluation in DEIS/DEIR process [should be discussed].	The regional alternatives were explicitly considered in the delay reduction and environmental analyses by studying a range of future demand and activity levels. Passenger levels analyzed cover a range from 29M passengers to 45M passengers. Similarly, 510,000 to 656,000 future aircraft operation levels were analyzed. The use of variable long-term passenger and operations forecasts allow for uncertainty relating to the rate of future economic growth, the development of high-speed rail alternatives, the acceptance and usage of video-conferencing, and the role of regional airports. The delay reduction analyses indicate that the proposed airside improvements, as well as the regional alternatives, are necessary for accommodating current and future levels of demand.
105.3	Regional Transportation	Regional Airports	Evaluation of MPA-owned Hanscom Field as a reliever airport for general aviation operations, origin/destination regional non-jet traffic, and short-haul origin/ destination jet traffic [should be discussed].	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.

Code	Topic 1	Topic 2	Comment	Response
105.4	Regional Transportation	Regional Airports	Consideration of ...[Hanscom Field] and other sitings for a second major Massachusetts Airport, with particular consideration of 1996 Executive Order relative to environmental justice [should be discussed].	Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Hanscom Field's potential service area overlaps with the service areas for several airports that already have the necessary infrastructure for commercial service. These airports are the Hanscom Field, T.F. Green/Providence, and Worcester Regional, all which have had or are undergoing major improvements to their terminal buildings, other landside facilities and airfields.
105.5	Delay	Model	Analysis of existing delays at Logan owing to specifically wind/weather effects and indirectly from delay at other airports [should be discussed].	Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project is designed to reduce delays at Logan Airport from adverse winds and taxiway congestion by addressing constraints at Logan Airport. Delays caused by conditions at other airports or other factors, such as mechanical failure, are not addressed since Massport cannot influence these delays. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports.
105.6	Noise	PRAS	Documentation of history of PRAS...as management tool and analysis of problems with implementation thereof [should be discussed].	The Supplemental DEIS/FEIR includes a discussion of PRAS including its historic development and the performance relative to the goals over time. PRAS goal achievement has improved considerably over time, particularly since the installation of the Enhanced PRAS in 1993 and the Revised PRAS in 1996. Chapter 8 also outlines a monitoring program that will provide regular updates on PRAS performance and serve as an aid to identify problems or areas for improvement.
105.7	Analysis Assumptions/ Methodologies	Base Year	The "base year" of 1999 [1993] does not adequately reflect changes since that time, and a base of 1998 extending to 2020 should be required....	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
105.8	Environmental Review Process	NEPA	Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations....	Implementation of the elements of the recommended Airside Project, specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will substantially reduce the delays that now occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable, and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred without the runway. Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. Refer to the discussion in Section 4.2 in the Supplemental DEIS/FEIR.
105.9	Noise	Sound Insulation	...soundproofing treatment...will be disproportionately unavailable in the poorer impacted communities because of the greater likelihood that residences will be non-compliant with relevant building codes...	Federal requirements typically exclude the FAA from any responsibility to bring a building up to code when the structure is sub-standard but otherwise qualifies to participate in an airport sponsored sound insulation program. However, to address impacts in particular projects such as the proposed Airside Project, FAA has discretion to use grant funds to bring buildings up to code as part of the mitigation program to the extent such improvement are required to proceed with the sound insulation work. The mitigation program for the Airside Project includes use of grant funds for such purposes. For the eligible residences, the FAA will fund building code improvements, to the extent necessary, to implement effective sound insulation treatment.
105.10	Environmental Review Process	MEPA	Alternatives to the build proposal are required to be "rigorously explored and evaluated" and alternatives, which were eliminated from detailed study, should be explained referencing briefly reasons for eliminating these alternatives.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to FAA scoping directives, applicable FAA environmental orders and all other NEPA requirements.

ELLIS NEIGHBORHOOD ASSOCIATION, INCORPORATED
Post Office Box 961, Back Bay Annex, Boston, MA 02117

LETTER 106

April 22, 1999

Secretary Bob Durand
Executive Office of Environmental Affairs
Environmental Impact Review
100 Cambridge Street
Boston, MA 02108

FAX 617-727-1598

Attention Arthur Pugsley

The Ellis Neighborhood Association, located in the South End, would like to comment on the Massachusetts Port Authority proposal to add a runway and reconfigure taxi ways at Logan Airport to reduce delays at the facility.

Unfortunately, the cost of the proposal is too high. It is estimated that the flights over the South End will increase from roughly 18,000 a year to over 40,000 a year, and then grow from there. This is an increase from nearly 50 flights a day to 115 flights a day, assuming the flights are spread evenly over 365 days. But these flight will largely occur during periods of "non prevailing winds", estimated at 25% of the time, which suggests as many as 444 flights a day (40,000 flights divided by 90 days). This is unacceptable. 106.1

Some of these planes are so noisy, one has to stop conversations until the plane has passed. These planes should be banned from using Logan.

Other planes fly so low they take a long time to rumble by. These planes should be directed to fly over the ocean until they reach an altitude high enough so the sound is dissipated (and then hopefully turn toward land at someplace other than over the city).

Thank you for the opportunity to comment.

Very truly yours,

Elizabeth S. Boveroux

Elizabeth S. Boveroux
President

Letter 106
Ellis Neighborhood Association, Inc.
Elizabeth S. Boveroux, President

Code	Topic 1	Topic 2	Comment	Response
106.1	Noise	Impacts	It is estimated that the flights over the South End will increase from roughly 18,000 a year to over 40,000 a year...This is unacceptable.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.

M:\eastd\LOG2466\Docs\Reports\Renumbered Comments & Responses\Letter 106.doc

EMC Corporation

171 South Street
Hopkinton, MA USA
01748-9103

508 435 1000
www.emc.com

LETTER 107

To: Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458

From: Richard J. Egan, Chairman, EMC Corporation

Date: April 8, 1999

Subject: Massport's Plan to Improve Logan Airport

This note is sent in support of Massports plan to improve the timeliness, safety and environment of Logan Airport and it's surrounding area.

My reasons for this are best described by the attached Op-Ed piece which appeared in the March 28th edition of the Boston Herald.

Additionally, I have studied this plan and firmly believe that it will in fact improve the overall environment by decreasing the noise and jet exhaust over the adjacent inhabited areas.

I hope that your study of this matter is not diverted by the opponent's claims that other regional airports are a better solution.

While there are serious plans currently underway to provide better access to other airports they unto themselves are not the solution offered by this Massport plan whose implementation has long been delayed by a small but vocal group who will remain dissatisfied with Logan until it is shut down.

Respectfully yours,

RJE:mlh
mepa0407.doc

Enclosure

Boston Sunday Herald

MARCH 28, 1999 • $1.75

Economy demands new runway

Do you realize our region's link to global markets, tourism dollars, customers and conventioneers can be shattered by something as simple as a strong northwest wind? That key link is Logan Airport. And when northwest winds prevail, as they often do, Logan can operate only two of its runways — and sometimes only a single runway.

No surprise, then, that when it comes to time-wasting and money-wasting delays, Logan is one of the worst airports in the country. In fact, Logan's airfield is so inadequate that, according to Massport, it cost corporations more than $310 million in lost productivity last year.

Richard J. EGAN

Consider my company, EMC Corp. We are now the largest computer company headquartered in Massachusetts. Every day, several hundred EMC sales reps, engineers and executives fly in and out of Logan — as do their thousands of counterparts from other companies. Clearly, I and EMC's 3,800 Massachusetts workers have a lot invested in Logan. Logan is our gateway to the world. But we find it incredible that on a bright, clear, sunny day, with not a snowflake in sight, flights into Logan can be delayed up to three hours ... all due to weather.

As a coastal airport in New England, Logan is subject to the whims of Mother Nature. Snow, fog and poor visibility all can cause delays. While I am never happy to hear that EMC employees and customers are affected by delays at Logan, at least it is understandable when a foot of snow has fallen or fog is blanketing Boston.

The cause of the problem is simple: There have been no improvements made to Logan's airfield in over 20 years. To meet peak demand, Logan needs three runways in operation. The makeup of Logan's airfield is such that when winds blow from the Northwest, delays can total thousands of hours.

This problem will not go away on its own. Logan's delays will worsen if nothing is done, and the cost to our economy will continue to grow. The issue has been talked about for more than 20 years, and for 20 years the problem has gotten worse.

Should we wait until companies start to pack their bags in search of a more efficient transportation link? What about when large conventions pass on Boston's new convention center because getting into the city is too much of a hassle? We cannot afford to wait any longer.

I'm concerned enough about Logan and its ability to keep this state tied to the global economy that I have set up a coalition of more than 50 Massachusetts CEOs who want to help Massport make Logan better.

The Logan On Time Committee is composed of companies like Gillette, Analog Devices, Teradyne and Fidelity. All told, these corporations employ 500,000 people in this state. These are companies where thousands of workers travel for a living; companies where jobs, profits and state tax revenues depend on getting from Boston to other cities, Europe, Asia and the rest of the world quickly and reliably. Our group is working overtime to make sure Massport goes ahead with construction of a new runway.

My business depends on Logan to succeed, so I am making its success my business. The pace of EMC's business doesn't slow down when there are northwesterly winds. Neither should Logan's.

Richard J. Egan is founder and chairman of EMC Corp. of Hopkinton, a provider of enterprise computer storage systems, software and services.

107.1

Letter 107
EMC Corporation
Richard J. Egan, Chairman

Code	Topic 1	Topic 2	Comment	Response
107.1	Purpose and Need	Delays	This problem will not go away on its own. Logan's delays will worsen if nothing is done,...The pace of EMC's business doesn't slow down when there are northwesterly winds. Neither should Logan's.	Comment noted.

Excavating & Building Material
Teamsters, Chauffeurs and
Helpers
Affiliated with the International Brotherhood of Teamsters

29 Farragut Road
South Boston, Massachusetts 02127
Telephone (617) 464-3379
Fax (617) 464-2379

LOCAL UNION 379

PAUL V. WALSH
SECRETARY-TREASURER
PRINCIPAL EXECUTIVE OFFICER

JOHN P. MAHONEY
BUSINESS REPRESENTATIVE

LETTER 108

April 22, 1999

Secretary of Environmental Affairs
Attn: MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458
100 Cambridge St., 20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

The International Brotherhood of Teamsters Union, Local 379, is writing today in full support of the Massachusetts Port Authority's Airside Improvement plan for Logan International Airport. Local 379 firmly believes this project is necessary to reduce delays, improve the quality of life of our members and provide much needed employment opportunities.

Delays at Logan are consistently among the worst in the U.S. These delays are not only inconvenient, they are costly. In 1998 delays at Logan cost airlines and their passengers nearly $310 million. These losses ultimately affect the livelihood of many working men and women as it impedes the ability of Boston and the region to compete in a global economy. 108.1

A major component of the Airside Improvement project, Runway 14/32, provides significant noise relief for our members living in the highest impacted noise areas of East Boston's Bayswater, Revere's Beachmont and Winthrop's Court Road and Point Shirley as well as South Boston's Castle Island area. The new unidirectional Runway shifts 75,000 flights over water rather than over communities. It also allows noise impacts to be spread more equitably across communities. The proposed centerfield taxiway and other improvements would further enhance air quality by reducing aircraft idling and queuing on the airfield and reduce ground noise from taxing aircraft to adjacent neighborhoods. 108.2 108.3

With an annual economic impact of $5 billion, Logan International Airport is directly responsible for creating more than 15,000 jobs in this area, many of which are the hard working men and women of Local 379.

It is therefore, without reservation, that Local 379 wholeheartedly support's Airside Improvements at Logan Airport and looks forward to the projects approval.

Thank you for your attention to this matter.

Sincerely yours,

Paul V. Walsh
Secretary-Treasurer
Principal Executive Officer

PVW/mec

Letter 108
Excavating & Building Material Teamsters, Chauffeurs & Helpers -- Local Union 379
Paul V. Walsh, Secretary-Treasurer Principal Executive Officer

Code	Topic 1	Topic 2	Comment	Response
108.1	Purpose and Need	Delay	...firmly believes this project is necessary to reduce delays...These delays are not only inconvenient, they are costly...it impedes the ability of Boston and the regional to compete in a global economy.	Comment noted.
108.2	Noise	Cumulative mpacts	...Runway 14/32, provides significant noise relief for our members living in the highest impacted noise areas of East Boston's Bayswater, Revere's Beachmont and Winthrop's Court Road and Point Shirley as well as South Boston's Castle Island area.	Comment noted.
108.3	Air Quality	Taxiway Improvements	The proposed centerfield taxiway and other improvements would further enhance air quality....	Comment noted.

David C. Weinstein
Chief of Administration
and Government Affairs

82 Devonshire Street F5A
Boston, MA 02109-3614
Phone: 617 563-6578
Fax: 617 476-7356
E-mail: david.weinstein@fmr.com

LETTER 109

April 23, 1999

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley--EOEA No. 10458
100 Cambridge Street
20th floor
Boston, MA 02205

Dear Mr. Pugsley:

Fidelity Investments is a global financial services company and the largest mutual fund firm in the United States. We have 12,600 employees in Massachusetts, including nearly 10,000 at our world headquarters in Boston. We are the largest private employer in Suffolk County and the 4th largest private employer in Middlesex County.

For a large, growing company like ours, the proximity of a convenient airport offering reliable and safe air travel is an absolute necessity. We strongly support the modernization of Logan Airport and the construction of runway 14/32 because an inefficient Logan hurts the productivity of businesses, wastes time and money and negatively impacts the local and regional economy. 109.1

We have other major operations within New England, in New Hampshire and Rhode Island, and in five other states. A convenient, efficient airport is a critical factor in deciding where to locate and where to grow. It is no accident that our New Hampshire and Rhode Island facilities, where a combined 3,700 employees work, are within short drives of the Manchester and T.F. Green airports, respectively. We support any and all efforts to expand usage of those regional airports (and Worcester and New Bedford), not only because it helps serve our employees in other locations, but also alleviates Logan's congestion and contributes to a diversified and robust New England economy. 109.2

Logan Airport has an annual economic impact of $5 billion, providing jobs for 15,000 citizens and supporting more than 100 airport-related businesses. Put simply, Logan contributes $13.7 million to the local economy every single day. While ranking 11th in operations among U.S. airports, Logan has the 6th-worst delay problem. In 1998, Logan suffered from 120,000 delay hours at a cost of $319 million.

In 1998, Fidelity spent almost $50 million in airline tickets -- about 75 percent of which was travel through Logan. Fidelity employees traveled on more than 100,000 flights to and from Logan last year. Employees at a company like ours, with headquarters in Boston, must be able to travel easily and without undue delay to other locations in the U.S. and around the world. With 15 million customers in all 50 states, we have customers wherever airplanes can fly.

Unfortunately, we have an airport that often does not work. We must do better for our economic vitality today and for the future fiscal health of the Commonwealth. Construction of runway 14/32 should lead to greater growth, new jobs and a competitive regional economy leading into the 21st century.

Sincerely,

Letter 109
Fidelity Investments
David C. Weinstein, Chief of Administration and Government Affairs

Code	Topic 1	Topic 2	Comment	Response
109.1	Purpose and Need	Airfield Capacity	We strongly support the modernization of Logan Airport and the construction of runway 14/32 because an inefficient Logan hurts the productivity of businesses, wastes time and money and negatively impacts the local and regional economy.	Comment noted.
109.2	Regional Alternatives	Regional Airports	We support any and all efforts to expand usage...regional airports (and Worcester and New Bedford)....	Comment noted.

Fitcorp

Corporate Offices
800 Boylston Street / Prudential Center Suite 2475 / Boston, MA 02199
Phone: (617) 375-5600 Fax: (617) 375-5649

Gary T. Klencheski
President and CEO
E-mail: garyk@fitcorp.com

April 7, 1999

LETTER 110

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley – EOEA No. 10458
100 Cambridge Street
2oth Floor
Boston, MA 02205

Dear Mr Pugsley:

As President and CEO of Fitcorp, a Massachusetts company with 95 employees, I am writing you to state my strong support of a series of transportation initiatives, notably the Logan Airport modernization along with improvements to our high speed rail system and greater utilization of the Worcester, Providence and Manchester airports. My company's success is contingent upon a strong economy in Boston. The five leading industries that account for more than half of the jobs in our region are dependent upon a Logan that operates efficiently.

Logan's transportation services are essential to the economic success of the entire region. Unfortunately, Logan is one of the most delay prone airports in the county, ranking sixth in 1998. No changes have been made to Logan's airfields since 1977, and since then, operations have increased by 112%. Massport's plan for a new runway designed for all arrivals and departures taking place over Boston Harbor should lead to greater growth, better jobs, and a competitive regional economy. 110.1

With the development of a new convention center there will be an increased demand for air traffic in Greater Boston over the next decade. Runway 14/32 at Logan will help us meet this demand. In addition, we need to increase utilization at the regional airports in Worcester, New Bedford, Providence, and Manchester and also incorporate high-speed rail into our region. 110.2

Our future economic competitiveness hinges on Logan's modernization. Thank you for your consideration.

Sincerely yours,

Gary T. Klencheski

Gary T. Klencheski



Letter 110
Fitcorp
Gary T. Klencheski, President and CEO

Code	Topic 1	Topic 2	Comment	Response
110.1	Purpose and Need	Delay	...Logan is one of the most delay prone airports in the country ...there will be an increased demand for air traffic in Greater Boston over the next decade. Runway 14/32 at Logan will help us meet this demand	Comment noted.
110.2	Regional Alternatives	Regional Airports	...we need to increase utilization at the regional airports in Worcester, New Bedford, Providence, and Manchester and also incorporate high-speed rail into our region.	Massport considers Logan Airport to be part of a regional system of airports that includes the T.F. Green/Providence, Manchester and Worcester Regional airports. Service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate growth in air travel demand. While greater use of the regional airports and high-speed rail will provide relief to Logan Airport, the proposed Airside Project provides clear benefits at current, as well as future, traffic levels. The benefits will only increase in the future, even as regional transportation developments act to reduce the rate of future growth at Logan Airport.



The Franklin Park Coalition

LETTER 111

April 21, 1999

Robert A. Durand, Secretary
Executive Office of Enviromental Affairs
100 Cambridge Street - Room 2000
Boston, Massachusette 02202

Attention: MEPA Office

Re: Massachusetts Enviromental Protection Act review of Massachusetts Port Authority's Enviromental Impact Statement concerning proposed construction of Runway 14/32 at Logan Airport.

Dear Secretary Durand:

I write on behalf of the Board of Directors and the membership of The Franklin Park Coalition to oppose the construction of Runway 14/32 because it would increase already excessive and noisy flights over Franklin Park and because we believe parts of Massport's EIS to be inaccurate.

The Franklin Park Coalition (Coalition), formed in 1974 in response to the deterioration of Franklin Park (the Park), is dedicated to the restoration and preservation of the Park and to safeguarding the design of Frederick Law Olmsted.

Franklin Park is the only park in the city of Boston large enough, at 500 acres, to create the illusion that one has left the city. This rural experience was the intent of Olmsted's design and the purpose of the Park.

Despite being over 6 miles from Logan Airport, flights from Runway 27 are so low and so loud as they pass directly over the Park as to disrupt entirely the peace and enjoyment intended for Park users.

These users include: birdwatchers, strollers, joggers, picnicers (it is one of the few Boston parks which allow cookouts), bicyclists, dog-walkers, golfers, neighborhood softball players, schoolchildren and visitors to The Franklin Park Zoo. All these activities are spoiled by the noise of Logan flights.

Currently, flights from Runway 27 number approximately 19,000 a year. Under Massport's proposal these flights would increase to approximately 56,000 a year.

Massport downplays the level of noise from Logan flights by averaging the decibel level of flights with the decibel levels between flights. This is tantamount to determining a speeding violation by averaging the speeds 111.1

a driver maintains at a red light with the speeds used on a highway. We believe this practice to be inaccurate, fraudulant and disingenuous.

The Coalition believes it is unreasonable that Massport's Logan operations continue to degrade the quality of life in Franklin Park as elsewhere in the Greater Boston area. For this reason we ask you to reject Massport's EIS and join us and others in requiring Massport to use regional airports, Peak Hour Pricing and other alternatives which will lower Logan's maximum flight capacity goals.

The Coalition believes that Franklin Park, where urban dwellers can retreat from urban life, is unique and a treasure to be safeguarded. It would be egregious to sacrifice this wonderful Park to the dubious demands of a short-term efficiency.

We thank you for this opportunity to comment and ask that this letter be entered into the official record of any proceedings concerning Massport's application to build Runway 14/32.

Very truly yours,

The Franklin Park Coalition
Martha Karchere, President
P.O. Box 2333
Jamaica Plain, MA 02130

cc: John DeVillars, EPA
Governor Paul Cellucci
Thomas F. Birmingham, Senate President
Thomas Finneran, Speaker of the House
Thomas Menino, Mayor of Boston
Boston City Council
Chelsea City Council
Winthrop Board of Selectman
C.A.R.E.
Justine Liff, Commisioner, Boston Parks and Recreation

Letter 111
The Franklin Park Coalition
Martha Karchere, President

Code	Topic 1	Topic 2	Comment	Response
111.1	Noise	Impacts	Massport downplays the level of noise from Logan flights by averaging the decibel level of flights with the decibel levels between flights. We believe this practice to be inaccurate, fraudulent and disingenuous.	The Supplemental DEIS/FEIR considers a variety of noise metrics in the assessment of noise impacts from the various alternatives. These are intended to shed additional insight on how the noise is likely to change from one alternative to another. It is suggested the reader also refer to Appendix E for a discussion of noise metrics.

LETTER 112



Friends of Belle Isle Marsh

April 22, 1999

~~Trudy Coxe~~ Robert Durand
Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
20th Floor
Boston MA 02202
Attn: MEPA Unit

Mr. Durand
Dear ~~Ms. Coxe~~:

The Friends of Belle Isle Marsh (FBIM) is a nonprofit organization dedicated to protecting Belle Isle, the 250-acre saltmarsh located within the communities of East Boston, Revere and Winthrop. Since its creation in 1985, Belle Isle Park and Reservation has served as an urban oasis, affording city dwellers a rare opportunity to observe and enjoy nature at close hand.

Despite the constant threat of encroachment by Logan Airport, the MBTA, and the numerous commercial, marine and industrial operations that surround it, Belle Isle has managed to survive as a functioning saltmarsh and habitat for wildlife not usually found in such close proximity to urban neighborhoods.

Therefore, our special perspective is not only that we must protect the many species of birds, mammals and fish that live in Belle Isle Marsh, but that we must also ensure its peaceful use and enjoyment by human beings, as well.

It is arguable that the current levels of noise and air pollution caused by operations at Logan Airport already make a negative impact on the use and enjoyment of the marsh resources; but to argue that point is not our brief, at present. Addressing the plan at issue, as described in Massport's Draft Environmental Impact Statement/Report, the Friends find that this report is seriously deficient in its treatment of impacts under Section 4(f) of the Department of Transportation Act of 1966, as amended.



Our specific objections are as follows:

(1) On page ES 30-31, under the subhead Section 4(f) Determination, Massport states:

> Indirect impacts to Section 4(f) resources from implementation of the Preferred Alternative [1A]...were also considered...According to the legislation which established the Boston Harbor Islands Recreation Area, the extension of noise contours over Boston Harbor associated with unidirectional runway 14/32 would not be considered to constitute a use, or have a significant effect on the reccreation area...The proposed airside improvements at Logan Airport will not incorporate land from a section 4(f) resource, nor with soundproofing mitigation, affect the normal activity or aesthetic value of a public park, refuge, or historic site.

Despite the fact that Belle Isle Park and Reservation is the largest public parkland bordering Logan Airport, by definition clearly falling within the guidelines of Section 4(f), and that more of its acreage is directly under aircraft landing approaches than the Harbor Islands Recreation Area, Massport completely excludes Belle Isle from the discussion. On what grounds does Massport then conclude that the proposed airside improvements will not, "...with soundproofing mitigation, affect the normal activity or aesthetic value" of Belle Isle Park and Reservation? What method could, or would, Massport propose that would effectively soundproof a 150-acre park 200 feet below jet aircraft on a landing approach? The data to support these statements is not fully disclosed in this EIR (see no. 3, below.) 112.1

(2) See also Chapter 5 of the EIR, page 5-2, in which FAA requirements are discussed. Massport states that "there are several categories of resource that would not receive impacts, or would receive insignificant impacts" because "there are no parklands...on the airfield site." This does not constitute a full disclosure nor a thorough discussion of all the possible negative impacts of the proposed airside improvements. The existence of Belle Isle Park as a contiguous public park and nature reserve is not even mentioned (let alone the many other public parks and recreation areas nearby), and the data to support such conclusions is not included in this report or its appendices. 112.2

(3) None of the many noise contour maps included in this report specifically addresses the noise effects of the proposed Alternative 1A on Section 4(f) resources. The existing noise contour maps in the EIR are not easily usable in this regard, since they do not clearly show the location of Section 4(f) resources, including Belle Isle Marsh. However, it appears that all or most of Belle Isle Marsh, and Belle Isle Park within Belle Isle Marsh, may fall at least within the 65 DNL noise contour, and much of it may fall within the 70-75 DNL noise contour, under every scenario considered, both in 2010 and the 1993 baseline. Massport should specifically address this question, preferably by using actual monitoring data rather than computer modeling, and by presenting this data in legible tables or maps. 112.3

(4) Again, Massport focuses on the Harbor Islands Recreation Area, to the exclusion of Belle Isle Marsh, when it discusses Environmental Consequences in Chapter 6. The FAA's National Environmental Policy Act regulations require any proposed airport projects to demonstrate "land use compatibility." Based only on the fact that the legislation establishing the Boston Harbor Islands Recreation Area states that Logan Airport "shall not be deemed to have a significant effect on natural, scenic, and recreation assets...", Massport can conclude that the proposed improvements are not incompatible with "recreation assets" only by excluding Belle Isle Park and Reservation from this discussion.

The Reservation, unlike the Harbor Islands Area, was established by The Commonwealth and is not governed by the restrictive language of the federal statute. Thus, Massport is not absolved from its obligation to consider the effects of the proposed airside improvements on Belle Isle Marsh under FAA environmental criteria. 112.4

(5) Finally, as part of the Section 4(f) determination, the EIR has identified a state-listed endangered species, the upland sandpiper, nesting in the area of the proposed Centerfield Taxiway (see Chapter 6, sections 6.4.4, 6.4.5.) Massport proposes a mitigation that will include habitat enhancement both onsite and offsite to ensure that there is a "net benefit" to the upland sandpiper population. However, by way of documentation, Massport offers (in Technical Appendix N) only a letter from the Massachusetts Division of Fisheries and Wildlife in response to Massport's initial inquiries. This is very far from being a fully disclosed mitigation plan. Has Massport contacted the Defense Department and reached agreement on the use of Camp Edwards as a mitigation site? Is there provision for ongoing monitoring of the upland sandpiper population, in order to measure the effectiveness of the mitigation? These are some of the elements of a well-thought out mitigation plan that should have been addressed in this EIR. 112.5

In addition to the points we have listed above, there are many other areas in which this EIR is deficient; however, the Friends feel that the strongest objection lies not in what Massport has included in this report but in what it has left out.

It defies both reason and logic for Massport to assert that a 50 percent increase in air operations at Logan over the next 10 years will have no significant impact on the natural resources surrounding the airport. The only way for Massport to sustain this position is to leave out of the EIR any meaningful data that would allow us to measure changes in noise, air and water pollution levels in Belle Isle Marsh. We urge MEPA to find this draft EIR unacceptable, and we thank you for your careful consideration of these comments.

Sincerely,

Gail Miller, Chairperson, Conservation Committee
Elizabeth Regan, Vice President
FRIENDS OF BELLE ISLE MARSH

Letter 112
Friends of Belle Island Marsh
Gail Miller, Chairperson
Conservation Committee

Code	Topic 1	Topic 2	Comment	Response
112.1	Noise	Sound Insulation	On what grounds does Massport then conclude that the proposed airside improvements will not "...with soundproofing mitigation, affect the normal activity or aesthetic value" of Belle Isle Park and Reservation?	The noise levels in the vicinity of Belle Island Park and Reservation are lower with the Preferred Alternative than with the No-Action Alternative. The difference can be seen by comparing the values of the Day-Night Sound Level (DNL) at Monitor No. 8 (Morton and Amelia in Winthrop) and Monitor No. 16 (Bradstreet and Sales in Revere) which bracket the Belle Island Marsh area. With the 29M Low Fleet scenario, the DNL at Monitor No. 8 decreases by 0.1 dB and at Monitor No. 16 by 0.4 dB. With the 37.5M Low Fleet scenario, the DNL at Monitor No. 8 decreases by 1.1 dB and at Monitor No. 16 by 1.4 dB.
112.2	Open Space/ Parkland	Impacts	..."there are no parklands...on the airfield site." The existence of Belle Isle Park as a contiguous public park and nature reserve is not even mentioned....	There are no parklands on the airfield site, as depicted in Figure 6.3-4 of the Supplemental DEIS/FEIR. In addition, Belle Isle Park, while within the existing No Action Alternative 65 dB DNL noise contour, will have no noise increase under the Preferred Alternative. Refer to Section 6.3.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative.
112.3	Noise	Impacts	None of the many noise contour maps included in this report specifically addresses the noise effects of the proposed Alternative 1A on Section 4(f) resources...it appears that all or most of Belle Isle Marsh...may fall at least within the 65 DNL noise contour... Massport should specifically address this question, preferably by using actual monitoring data rather than computer modeling, and by presenting this data in legible tables or maps.	Figure 5-19 in the *1997 Massport GEIR Update* shows that the 1996 and 1997 DNL 65 dB contours include about one-half of the marsh area. These two contours appear to occupy about the same area as does the 1993 reference contour in Figures 6.2-9 through 6.2-12 of the Supplemental DEIS/FEIR which are over less clear maps. The contours for all the alternatives for 1999 and 2010 appear to be inside the 1993 contour in the Belle Island Marsh area. Therefore, the noise exposure for the Belle Island Marsh area is expected to continue to decrease in the future. Refer to Section 6.3.3 of the Supplemental DEIS/FEIR.
112.4	Open Space/ Parkland	Impacts	The Reservation unlike the Harbor Islands Area, was established by The Commonwealth and is not governed by the restrictive language of the federal statute. Thus, Massport is not absolved from its obligation to consider the effects of the proposed airside improvements on Belle Isle Marsh under FAA environmental criteria.	Refer to response to Comment 112.2.
112.5	Ecosystems	Rare Species	...upland sandpiper population. Has Massport contacted the Defense Department and reached agreement on the use of Camp Edwards as a mitigation site? Is there provision for ongoing monitoring of the upland sandpiper population, in order to measure the effectiveness of the mitigation?	Chapter 6 of the Supplemental DEIS/FEIR documents the agreements developed between Massport and the MAANG.

LETTER 113

Greater Boston Chamber
The Hub of Business

April 23, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley – EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02205

John C. Silva
Manager, Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Re: EOEA #10458

As President and Chief Executive Officer, I appreciate the opportunity to on behalf of the Greater Boston Chamber of Commerce to present our views on Logan International Airport and other regional transportation alternatives. The Greater Boston Chamber of Commerce is a non-profit organization that represents more than 1,700 of the leading businesses in our region. The Chamber supports the vision outlined in the four volume *Logan Airside Improvements Planning Project Draft Environmental Impact Statement/Report EOEA #10458.*

113.1

We support this vision for a reason noted in the first chapter of the first section of the first volume: "The essential role that Logan plays in the regional economy is threatened by a serious problem of aircraft delay."

More broadly, we support an R^2 approach -- the construction of runway 14/32 in conjunction with the greater utilization of regional airports both inside and outside Massachusetts. Neither the runway nor the regional airports alone will serve all of our transportation needs. In conjunction with one another, however, both the runway and the regional airports can make our transportation system more efficient and improve the quality of life for those who live both near and far from major transportation nodes.

Logan's Importance

Annually, Logan has an impact of $5 billion, provides employment for more than 15,000 individuals, and supports more than one hundred airport-related businesses. Put another way, Logan contributes almost $13.7 million to the local economy every single day.

A recent survey of Chamber members reveals that two in three find convenient and frequent air service extremely important to their companies. Additionally, more than three in four expect their business usage of Logan to increase over the next five years, which means that if we do nothing today, Logan's problems will soon significantly worsen. Inaction now means that in just five years we will look back to the halcyon days of 1998, when Logan suffered from 120,000 delay hours, which the Draft EIS/EIR notes, "produced an aggregate cost of $313 million to airlines and their passengers."

The Chamber publication *Greater Boston's Leading Industries: Drivers of the Regional Economy 1999-2000* reveals that financial services, health care, high technology, knowledge creation, and tourism provide more than half of the jobs in our region. The draft EIS/EIR asserts, "Each of these sectors depends on high quality of air transportation services for their continued success." To further this success, or, in other words, to keep the Massachusetts job machine working well, we must rectify the competitive disadvantage that Logan will become in the future.

The Chamber spearheaded city-to-city trips to Atlanta in 1997 and to Seattle in 1998. These cities, as well as our other competitors around the country, are modernizing their airports. We must do the same in our great city so that, for instance, companies do not move their headquarters out of our region. Such moves would mean fewer jobs for Massachusetts.

The Need for Runway 14/32 and the Taxiway

The Federal Aviation Administration statistics listed in the Draft EIS/EIR bear out the fact that Logan should but does not serve as a competitive advantage for Boston. While ranking seventeenth in terms of passenger volume at U.S. airports, Logan suffers from the sixth worst delay problem. To help to address this discrepancy, the Greater Boston Chamber of Commerce endorses both the over-the-water runway, which would reduce delays by 25 percent annually, and the taxiway improvements, which will cut delays by some 15,000 hours per year

113.2
113.3

Economically, Boston will continue to thrive only if it has the best resources rather than the worst problems. The imminent construction of the new convention center reaffirms this axiom, but only if Logan meets two conditions. First, the airport must improve so that conventioneers will want to fly into Boston. Additionally, after having made this destination decision, conventioneers will need to have positive travel experiences by arriving in Boston and at the convention center (or their hotels) in a timely fashion.

Regional Airports and Other Transportation Alternatives

As noted, the Chamber also supports the initiative to increase the use of regional airports in Worcester, New Bedford, Providence, and Manchester. Notably, the Commonwealth is already spelling out its regional plans.

113.4

Specifically, the state seeks to have Massport operate Worcester, extend commuter rail service to T.F. Green Airport in Providence, and make roadway improvements to Manchester. Regarding Worcester, Draft EIS/EIR figure 2.4-2 shows that its airport captures only nine percent of market area passengers. the lowest share by far of any of six New England airports. This statistic suggests that an opportunity exists to grow the Worcester Airport.

On the ground, high-speed rail will bring the northeast corridor to our great city. With a stop at South Station, the Silver Line will move residents and visitors alike from Dudley to Logan with stops in the Seaport District.

But all of these transportation projects, worthy in their own right, do not relieve Logan's already heavy and soon to be heavier burden. The Draft EIS/EIR asserts that "even the diversion of up to 7 million passengers would not eliminate the need for airfield improvements designed to reduce airside delays and increase Logan's operational efficiency."

To extend the example of the convention center, business people will not fly into regional airports when Logan lies across the Harbor from the Seaport District. While some 1.2 million people per year will utilize high-speed rail, more than 35 million others will still use Logan by 2010. Finally, the Silver Line provides brilliant connections from the airport into downtown and beyond, but will only prove worthwhile if we make every effort to modernize Logan.

Conclusion

We need a modernized airport to bring people to our great city. Today, we have an airport that all too often does not work. We must do better for our own economic vitality today and for the future fiscal health of our city, state, and region.

In summary, therefore, both the modernization of Logan and the increased utilization of other transportation alternatives should lead to greater growth, better jobs, and a stronger regional economy as we confront the increasingly competitive 21st century.

Thank you for considering the views of the Greater Boston Chamber of Commerce.

Sincerely,

Paul Guzzi, President and
Chief Executive Officer

cc: Greater Boston Chamber of Commerce Logan Airport Task Force
Kevin C. Phelan, Meredith & Grew
Chair, Logan Airport Task Force
Peter J. Bassett, Bristol Property Management

George Berkowitz, Legal Sea Foods
Stanley Durlacher, Carlisle Consulting Group
Kathleen Hearn, Boston Gas Company
Michael D. Holmes, Carlin Insurance
Donald B. Holmes. KPMG Peat Marwick
Brian M. Hurley, Rackemann, Sawyer & Brewster
Michael Joyce. Deloitte & Touche
Richard Lettieri, Ropes & Gray
Paul R. McDonough, HNTB
Raymond Murphy, Palmer & Dodge
James F. O'Leary, Paul Revere Transportation Company
Robert J. Palermo, GZA
Dusty S. Rhodes, Conventures
Richard Snyder, Goldstein & Manello
Robert Soucy, Eastern Connection
Timothy L. Vaill, Boston Private Bank & Trust Company
Gail Visentin, British Airways
David Zebney, Fidelity Investments

Greater Boston Chamber of Commerce Staff
James Klocke, Director, Government Affairs & Economic Development
Mark S. Sternman, Assistant Director, Economic Development

Letter 113
Greater Boston Chamber
Paul Guzzi, President and Chief Executive Officer

Code	Topic 1	Topic 2	Comment	Response
113.1	Purpose and Need	Delay	The Chamber supports the vision outlined in the four volume *Logan Airside Improvements Planning Project Draft Environmental Impact Statement/Report EOEA #10458.* We support this vision for a reason noted in the first chapter of the first section of the first volume: "The essential role that Logan plays in the regional economy is threatened by a serious problem of aircraft delay."	Comment noted.
113.2	Alternatives	Runway 14/32	...endorses...the over-the-water runway, which would reduce delays by 25 percent annually....	Comment noted.
113.3	Alternatives	Taxiway Improvements	...[endorses] the taxiway improvements, which will cut delays by some 15,000 hours per year.	Comment noted.
113.4	Regional Transportation	Regional Airports	...supports the initiative to increase the use of regional airports in Worcester, New Bedford, Providence, and Manchester.	Massport considers Logan Airport to be part of a regional system of airports that includes the T.F. Green/Providence, Manchester and Worcester Regional airports. Service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate growth in air travel demand. While greater use of the regional airports and high-speed rail will provide relief to Logan Airport, the proposed Airside Project provides clear benefits at current, as well as future, traffic levels. The benefits will only increase in the future, even as regional transportation developments act to reduce the rate of future growth at Logan Airport.

LETTER 114

Dear Chamber Member:

The Greater Boston Chamber of Commerce supports a series of transportation initiatives, notably the Logan Modernization project (including runway 14/32) and a greater emphasis on regional alternatives (such as high speed rail and an increased utilization of Worcester, Providence, and Manchester airports). We need your help to publicize business perspectives on these vital issues, particularly with respect to Logan. Our future economic competitiveness hinges on Logan's modernization. The five leading industries that account for more than half of the jobs in our region depend on a Logan that works well.

Greater Boston Chamber
The Hub of Business

Actions

- The public comment period on the environmental permitting will run until April 23. Using the talking points below, please send letters (and blind copy me) on Logan by that date to both:

Secretary of Environmental Affairs	John C. Silva
Attention MEPA Office	Manager, Environmental Programs
Mr. Arthur Pugsley - EOEA No. 10458	Airports Division, ANE-600
100 Cambridge Street	New England Region
20th Floor	12 New England Executive Park
Boston, MA 02205	Burlington, MA 01803

- Please consider testifying at one or both of the joint federal/state hearings to comment on Logan that will take place on April 7 and April 8. If you can testify or would like to provide more assistance with this effort, please call Mark Stemman at 617/557-7345 for more information about how these hearings work.

Talking Points for Your Comments *Please incorporate specifics on how Logan impacts your organization.*

- **Logan means jobs.** Annually, Logan has an economic impact of $5 billion, provides employment for more than 15,000 individuals, and supports more than one hundred airport-related businesses. Put another way, Logan contributes almost $13.7 million to the local economy every single day.
- **Logan's delay problems are bad and getting worse.** While ranking eleventh in terms of operations of U.S. airports, Logan suffers from the sixth worst delay problem. In 1998, Logan suffered from 120,000 delay hours at a cost of $319 million.
- **Regional transportation measures do not provide enough relief for the delay problem.** We endorse the initiative to increase the use of regional airports in Worcester, New Bedford, Providence, and Manchester. We support high-speed rail to bring the northeast corridor to our great state. But these measures will not handle all of the increased demand for air traffic in Greater Boston by 2010.

We have an airport that all too often does not work. We must do better for our own economic vitality today and for the future fiscal health of our state. The construction of runway 14/32 should lead to greater growth, better jobs, and a competitive regional economy as we continue to face increased competition in the 21st century. We look forward to working with you on this vital issue.

Sincerely,

Paul Guzzi

Paul Guzzi, President and
Chief Executive Officer

STATEMENT OF PAUL GUZZI
April 7, 1999

Good evening. For the record, my name is Paul Guzzi. I serve as President and Chief Executive Officer of the Greater Boston Chamber of Commerce, a non-profit organization that represents more than 1,700 of the leading businesses in our region.

Thank you for allowing me to share a few thoughts on Logan International Airport and other regional airports. I want to commend the federal and state governments for holding this joint public hearing.

First, whether and how we can modernize Logan will determine the future economic well being of our region. Annually, Logan has an impact of $5 billion, provides employment for more than 15,000 individuals, and supports more than one hundred airport-related businesses. Put another way, Logan contributes almost $13.7 million to the local economy every single day.

The Chamber, the Commonwealth, and the federal government all try to grow the job-creating segments of our economy. In this region, the Chamber has characterized these economic engines -- financial services, health care, high technology, knowledge creation, and tourism -- as the five leading industries. These industries provide more than half of the jobs in our region. To increase jobs, we must rectify the competitive disadvantage that Logan has become today and will increasingly become in the future.

Second, worsening delay problems at Logan will dramatically impact Boston businesses. While ranking seventeenth in passenger volume, Logan suffers from the sixth worst delay problem in the nation. In 1998, Logan suffered from 120,000 delay hours at a cost to us all of more than $300 million per year.

A recent survey of Chamber members reveals that three in four expect their business usage of Logan to increase over the next five years, which means that inaction today will lead to Logan's problems significantly worsening in the future. The Chamber survey also shows that more than fifty percent experience more delays at Logan than at other airports, whereas only 7.4 percent faced fewer delays in Boston.

114.1

Third, we support other regional transportation projects to take some of the burden off Logan. We endorse Logan modernization because even the realization of these projects will not provide sufficient relief for the delay problem. Specifically, the Chamber endorses both the over-the-water runway and the initiative to increase the use of regional airports in Worcester, New Bedford, Providence, and Manchester. As a forthcoming Chamber white paper will demonstrate, we also support high-speed rail to bring the northeast corridor to our great city.

114.2

114.3

These worthy transportation projects do not relieve Logan's already heavy and soon to be heavier burden. While some 1.2 million people per year will utilize high-speed rail, more than 35 million others will still use Logan by 2010. We need a modernized airport to bring people to our great city.

We have an airport that all too often does not work. We must do better for our own economic vitality today and for the future fiscal health of our city, state, and region. Runway 14/32 will lead to fewer delays, greater growth, better jobs, and a more competitive region as we enter into the increasingly global economy of the 21st century.

114.4

Letter 114
Greater Boston Chamber
Paul Guzzi, President and Chief Executive Officer

Code	Topic 1	Topic 2	Comment	Response
114.1	Regional Transportation	Regional Airports	...we support other regional transportation projects to take some of the burden off Logan. ...to increase the use of regional airports...	Extensive analysis of impacts of the 37.5 million scenario is discussed in detail in Chapters 5 and 6 of the Supplemental DEIS/FEIR.
114.2	Alternatives	Runway 14/32	...endorses...the over-the-water runway....	Comment noted.
114.3	Regional Transportation	Passenger Rail	...support high-speed rail to bring the northeast corridor to our great city.	Comment noted.
114.4	Purpose and Need	Delay	We need a modernized airport to bring people to our great city. Runway 14/32 will lead to fewer delays, greater growth, better jobs, and a more competitive region as we enter into the increasingly global economy of the 21st century.	Comment noted.

LETTER 115

GREATER GARDNER
CHAMBER OF COMMERCE

1898 • 1998
A CENTURY OF SERVICE

March 29, 1999

Mr. Arthur Pugsley
Executive Office of Environmental Affairs
MEPA Office
100 Cambridge Street
20th Floor
Boston, MA 02202

Dear Mr. Pugsley,

The Greater Gardner Chamber of Commerce, representing over 650 area businesses and over 12,000 employees throughout the Greater Gardner area, strongly supports MASSPORT's proposal for the development of a dedicated commuter runway at Logan International Airport.

Runway 1432 will be a dedicated runway for small-passenger commuter air traffic, generally 10, 20 and 30 passenger commuter planes. The development of this dedicated runway will provide for the maximization of existing longer commercial runways for larger airliners using Logan International.

Currently, Logan International Airport is ranked the 6th worse in the country for delays. The development of Runway 1432 will provide a great deal of relief and help alleviate the delay problems at Logan. The Greater Gardner Chamber of Commerce recognizes the need to alleviate the delay problems as a critical economic development initiative in the Commonwealth. 115.1

The Greater Gardner Chamber of Commerce stands strong in its commitment to continue the economic prosperity of the Commonwealth of Massachusetts and certainly Central Massachusetts, and supports the development of Runway 1432 as an important part of this economic development strategy.

If the Greater Gardner Chamber of Commerce can be of assistance in this matter, please contact me directly at (978) 632-1780, extension 11.

Sincerely,

Michael F. Ellis
President & CEO

Letter 115
Greater Gardner Chamber of Commerce
Michael F. Ellis, President and CEO

Code	Topic 1	Topic 2	Comment	Response
115.1	Purpose and Need	Delay	The development of Runway 14/32 will provide a great deal of relief and help alleviate the delay problems at Logan.	Comment noted.

FULD & COMPANY INC.
Corporate Research and Analysis

LETTER 116

April 20, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley--EOEA No. 10458
100 Cambridge Street - 20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

I am a frequent flyer, and therefore a "frequently delayed flier" when I'm trying to get back home to Boston. I'm writing to register my support for the proposed runway at Logan that would serve commuter aircraft. Massport's position on the runway makes sense to me – I believe that more efficient commuter flight operations would decrease delays *and* decrease the total noise level for surrounding communities. 116.1

The alternative suggestion that commuter operations be moved to Hanscom is not sensible. Most commuter flights serve connecting passengers who come into Logan on a large jet via a full service airline. 116.2

Please note that I live in Brookline, and that I am a member of the Brookline Transportation Board.

Sincerely yours,
FULD & COMPANY INC.

Michael A. Sandman
Senior Vice President

Letter 116
Fuld & Company
Michael A. Sandman, Senior Vice President

Code	Topic 1	Topic 2	Comment	Response
116.1	Purpose and Need	Delay	I'm writing to register my support for the proposed runway at Logan that would serve commuter aircraft...I believe that more efficient commuter flight operations would decrease delays and decrease the total noise level for surrounding communities.	Comment noted.
116.2	Regional Transportation	Regional Airports	The alternative suggestion that commuter operations be moved to Hanscom is not sensible. Most commuter flights serve connecting passengers who come into Logan on a large jet via a full service airline.	Comment noted.

LETTER 117

Green WORKS
160 Second Street
Cambridge, MA 02142
617.441.0958
www.greenworksusa.com

April 22, 1999

Re: EOEA No. 10458

Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, MA 02202
ATTN: Arthur Pugsley, MEPA Office

Dear Secretary Durand:

I write to urge that you find the Draft EIS presented by Massport in support of its proposed Runway 14/32 "airside improvement" project unacceptable.

The environmental and human impacts of further expansion of Logan Airport—whether through construction of Runway 14/32 or some other scheme yet to emerge from Massport's drawing boards–are simply too high. Nor has Massport made its case that Logan expansion is either a necessary or a desirable solution to our region's long-term transportation needs.

As detailed in the attached documents and elsewhere as well, environmental evidence against Massport's proposal is overwhelming.

Massport's proposal fails on any number of measures: It goes against the most fundamental environmental objective of all, which is to reduce impacts from current levels that are already too high, not merely manage (or allegedly manage) their trend ever upward; it flouts basic precepts of environmental justice that impacts should be distributed fairly across racial and socio-economic lines: it has been pushed forward without sufficient process for citizen involvement or acknowledgement of their concerns; and it seems to beg or sidestep as many questions and issues as it answers.

Specifically:

Massport has been neither forthright nor forthcoming about the true implications and impacts of its present expansion plan; the DEIS, therefore, is not a full disclosure document, as required by federal guidelines. With respect to environmental and human impacts:

Massport fails to consider that 14/32 is a growth-enabler likely to promote (not reduce) increased emissions. In evaluating air quality impacts of proposed runway 14/32, the DEIS adopts an approach that makes no apparent connection between a new runway and Logan's overall ability to handle the increased passenger loads projected by Massport. It's a strange and surprising position given Massport's oft-repeated

claims that delays at Logan will become intolerable to the traveling public without 14/32.

Feedback mechanism. It is probable that construction of a new runway will in fact create new opportunities for growth in airport operations, and consequently, in aircraft and motor vehicle emissions. *Viewed this way, Massport's assertion that air quality impacts from 14/32 are beneficial or negligible is just downright wrong.* 117.1

Massport pays scant attention to Logan's role in MA's ozone problem. Eastern Massachusetts is a serious non-attainment zone for ozone, and Logan ranks as a major source of precursors like oxides of nitrogen (NOx) and hydrocarbons that are key ingredients in ozone production. Yet the DEIS explores the issue superficially, despite its own projection that Logan growth will cause significant increases in NOx emissions in coming years. Nor does the DEIS address how Logan-related increases will affect Massachusetts' ability to meet tougher ozone standards slated to take effect next year. 117.2

Ground-level ozone. Ground-level ozone is associated with respiratory impairment and illness, especially in children and people with chronic respiratory conditions. *The issue raises concern with respect to residents across eastern Massachusetts, because the ozone impacts of precursor emissions are often greatest some miles from their original source, in this case Logan airport.*

Massport gives short shrift to air pollutants known to have serious health consequences. The DEIS glosses over or ignores key areas of concern with respect to air quality, including hazardous air pollutants, fine particulates, and noise. The medical literature clearly shows that all present serious cause for concern, especially for persons living near Logan airport.

Hazardous air emissions. The DEIS fails to properly consider certain hazardous air pollutants (HAPs) like benzene and formaldehyde that are known or probable carcinogens, through its misleading use of overly-broad categories. Airports are a major source of such HAPS in urban areas. 117.3

Fine particulates. Massport's own projections show significant increases in emissions of particulates with diameters less than 10 microns. That is undesirable in and of itself, but worse, the DEIS fails to adequately treat the special concerns associated with particulates of less than 2.5 microns. An increasing body of literature documents the adverse health effects associated with particulate air pollution, including symptoms of respiratory disease such as shortness of breath, cough, and asthma attacks. *Of special concern is the possibility that air quality levels in neighborhoods nearest Logan may be unacceptable already with respect to fine particles.* 117.4

Noise. The DEIS and Massport's treatment of noise as largely a nuisance factor to be dealt with only within the confines of narrowly-drawn and ill-defined contours is unacceptable. In fact, the scientific literature shows that noise can be a major health risk. *And, as the testimonials in this report and citizen comments at numerous nearings and meetings make clear, Massport's presumption that soundproofing is a satisfactory "answer" to noise means that whole neighborhoods must live hermetically-sealed lives, in which residents are denied use or enjoyment of their own outdoor property, and are left even unable to open their windows* 117.5

Massport understates or omits significant emissions, including motor vehicle traffic. The DEIS omits certain sources of emissions and appears to substantially understate others:

Motor vehicle traffic and emissions. Massport projects many millions of additional passengers using Logan in the years ahead. How will they get there, and what will be the emissions associated with growth in ground transportation to and from Logan? *The DEIS appears to sharply understate these motor vehicle emissions, by assuming—inexplicably—that motor vehicle traffic growth will lag well behind passenger growth; the direct opposite of what has actually proven true in recent years.* Also, the DEIS takes no account of emissions from motor vehicle traffic beyond Route 128 117.6

Aircraft emissions above 3,000 feet. The DEIS analysis does not include aircraft emissions at altitudes of above 3,000'. 117.7

There are some broader, more philosophical points, too, that provide equally compelling evidence against the DEIS and Massport's proposal. Massport appears to have deliberately framed this DEIS and its public arguments in support of a new runway as narrowly as possible, as if this were purely an exercise in airfield design, undertaken in a vacuum, or perhaps some remote desert.

In reality, of course, Logan sits at the center of one of nation's most densely populated regions. *In that context, Massport must be expected to show the same concern for the needs of, and attention to the impacts on, its human neighbors on the ground as it devotes to the passengers on its runways or the aircraft in the sky.*

Yet:

Massport's proposal flouts the tenets of environmental justice, Massport's proposal clearly flouts President Clinton's Executive Order No. 12898, making environmental justice a key criterion. Massport's proposal would further burden racially and income-diverse communities like East Boston, Roxbury, and Chelsea—communities that already face disproportionate and unfair environmental impacts from a number of sources (including, significantly, Logan). 117.8

Massport has ignored residents' concerns about potential existing impacts. Many residents of communities around Logan like East Boston, Chelsea, Winthrop, and others have offered serious and thoughtful concerns about potential health effects associated with existing levels of Logan usage. The DEIS fails to address these issues—yet sadly, similar concerns elsewhere have too often proved well-founded. A 1993 EPA study of Chicago's Midway airport, for example, found that certain emissions associated with aircraft operations at that much smaller facility contributed significantly to cancer cases in surrounding neighborhoods. *To answer residents' concerns and as a guide to transportation policy making, Massport should be required to thoroughly assess potential health effects associated with existing levels of Logan operations on Massachusetts residents.* 117.9

Massport lacks a long-term transportation plan that could de-emphasize Logan, and shift our region away from ever-increasing reliance on air travel. In preparing its DEIS, Massport was required to explore all reasonable alternatives. Instead, Massport appears to have looked seriously at only its traditionally preferred alternative: Expand Logan. And, equally, the DEIS reflects the fact that Massport has chosen to needlessly embrace the false notion that reliance on air travel must inevitably always trend upward.

Massport instead must be required to operate within the context of a true long-term transportation plan for our region, one that: (1) makes maximum best use of other airports in our region like T.F. Green and Manchester; but (2) shifts us away from ever-increasing reliance on air travel, and toward transportation alternatives like high-speed rail that have far lower environmental and human impacts. 117.10 117.11

In closing, one final observation: As someone with over two decades experience as an environmental and community organizer, I have never seen the diverse people of Boston and surrounding cities and towns so united as in their shared opposition to 14/32. As one East Boston resident says within the testimonials attached to these comments: "Enough is just enough."

To me, comments like those, made over and over by so many citizens at meetings and hearings these past few months, speak more eloquently and convincingly than anything else to all that is wrong with Massport's proposal to expand Logan.

Sincerely,

JOHN T. O'CONNOR



160 Second Street
Cambridge, MA 02142
617.441.0958
www.greenworksusa.com

EXPANDING IMPACTS:

Environmental and human costs of Logan expansion.

John T. O'Connor
President, Greenworks, Inc.
Cambridge, MA

160 Second Street
Cambridge, MA 02142
617.441.0958
www.greenworksusa.com

Dear Peter Blute
Here's your copy
sincerely
John O'Connor
& Ellen Welch
Mary

April 22, 1999

Re: EOEA No. 10458

Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, MA 02202
ATTN: Arthur Pugsley, MEPA Office

Dear Secretary Durand:

I write to urge that you find the Draft EIS presented by Massport in support of its proposed Runway 14/32 "airside improvement" project unacceptable.

The environmental and human impacts of further expansion of Logan Airport—whether through construction of Runway 14/32 or some other scheme yet to emerge from Massport's drawing boards–are simply too high. Nor has Massport made its case that Logan expansion is either a necessary or a desirable solution to our region's long-term transportation needs.

As detailed in the attached documents and elsewhere as well, environmental evidence against Massport's proposal is overwhelming.

Massport's proposal fails on any number of measures: It goes against the most fundamental environmental objective of all, which is to reduce impacts from current levels that are already too high, not merely manage (or allegedly manage) their trend ever upward; it flouts basic precepts of environmental justice that impacts should be distributed fairly across racial and socio-economic lines; it has been pushed forward without sufficient process for citizen involvement or acknowledgement of their concerns; and it seems to beg or sidestep as many questions and issues as it answers.

Specifically:

Massport has been neither forthright nor forthcoming about the true implications and impacts of its present expansion plan; the DEIS, therefore, is not a full disclosure document, as required by federal guidelines. With respect to environmental and human impacts:

Massport fails to consider that 14/32 is a growth-enabler likely to promote (not reduce) increased emissions. In evaluating air quality impacts of proposed runway 14/32, the DEIS adopts an approach that makes no apparent connection between a new runway and Logan's overall ability to handle the increased passenger loads projected by Massport. It's a strange and surprising position given Massport's oft-repeated

claims that delays at Logan will become intolerable to the traveling public without 14/32.

Feedback mechanism. It is probable that construction of a new runway will in fact create new opportunities for growth in airport operations, and consequently, in aircraft and motor vehicle emissions. *Viewed this way, Massport's assertion that air quality impacts from 14/32 are beneficial or negligible is just downright wrong.*

Massport pays scant attention to Logan's role in MA's ozone problem. Eastern Massachusetts is a serious non-attainment zone for ozone, and Logan ranks as a major source of precursors like oxides of nitrogen (NOx) and hydrocarbons that are key ingredients in ozone production. Yet the DEIS explores the issue superficially, despite its own projection that Logan growth will cause significant increases in NOx emissions in coming years. Nor does the DEIS address how Logan-related increases will affect Massachusetts' ability to meet tougher ozone standards slated to take effect next year.

Ground-level ozone. Ground-level ozone is associated with respiratory impairment and illness, especially in children and people with chronic respiratory conditions. *The issue raises concern with respect to residents across eastern Massachusetts, because the ozone impacts of precursor emissions are often greatest some miles from their original source, in this case Logan airport.*

Massport gives short shrift to air pollutants known to have serious health consequences. The DEIS glosses over or ignores key areas of concern with respect to air quality, including hazardous air pollutants, fine particulates, and noise. The medical literature clearly shows that all present serious cause for concern, especially for persons living near Logan airport.

Hazardous air emissions. The DEIS fails to properly consider certain hazardous air pollutants (HAPs) like benzene and formaldehyde that are known or probable carcinogens, through its misleading use of overly-broad categories. Airports are a major source of such HAPS in urban areas.

Fine particulates. Massport's own projections show significant increases in emissions of particulates with diameters less than 10 microns. That is undesirable in and of itself, but worse, the DEIS fails to adequately treat the special concerns associated with particulates of less than 2.5 microns. An increasing body of literature documents the adverse health effects associated with particulate air pollution, including symptoms of respiratory disease such as shortness of breath, cough, and asthma attacks. *Of special concern is the possibility that air quality levels in neighborhoods nearest Logan may be unacceptable already with respect to fine particles.*

Noise. The DEIS and Massport's treatment of noise as largely a nuisance factor to be dealt with only within the confines of narrowly-drawn and ill-defined contours is unacceptable. In fact, the scientific literature shows that noise can be a major health risk. *And, as the testimonials in this report and citizen comments at numerous hearings and meetings make clear, Massport's presumption that soundproofing is a satisfactory "answer" to noise means that whole neighborhoods must live hermetically-sealed lives, in which residents are denied use or enjoyment of their own outdoor property, and are left even unable to open their windows*

Massport understates or omits significant emissions, including motor vehicle traffic. The DEIS omits certain sources of emissions and appears to substantially understate others:

Motor vehicle traffic and emissions. Massport projects many millions of additional passengers using Logan in the years ahead. How will they get there, and what will be the emissions associated with growth in ground transportation to and from Logan? *The DEIS appears to sharply understate these motor vehicle emissions, by assuming—inexplicably—that motor vehicle traffic growth will lag well behind passenger growth; the direct opposite of what has actually proven true in recent years.* Also, the DEIS takes no account of emissions from motor vehicle traffic beyond Route 128

Aircraft emissions above 3,000 feet. The DEIS analysis does not include aircraft emissions at altitudes of above 3,000'.

There are some broader, more philosophical points, too, that provide equally compelling evidence against the DEIS and Massport's proposal. Massport appears to have deliberately framed this DEIS and its public arguments in support of a new runway as narrowly as possible, as if this were purely an exercise in airfield design, undertaken in a vacuum, or perhaps some remote desert.

In reality, of course, Logan sits at the center of one of nation's most densely populated regions. *In that context, Massport must be expected to show the same concern for the needs of, and attention to the impacts on, its human neighbors on the ground as it devotes to the passengers on its runways or the aircraft in the sky.*

Yet:

Massport's proposal flouts the tenets of environmental justice, Massport's proposal clearly flouts President Clinton's Executive Order No. 12898, making environmental justice a key criterion. Massport's proposal would further burden racially and income-diverse communities like East Boston, Roxbury, and Chelsea—communities that already face disproportionate and unfair environmental impacts from a number of sources (including, significantly, Logan).

Massport has ignored residents' concerns about potential existing impacts. Many residents of communities around Logan like East Boston, Chelsea, Winthrop, and others have offered serious and thoughtful concerns about potential health effects associated with existing levels of Logan usage. The DEIS fails to address these issues—yet sadly, similar concerns elsewhere have too often proved well-founded. A 1993 EPA study of Chicago's Midway airport, for example, found that certain emissions associated with aircraft operations at that much smaller facility contributed significantly to cancer cases in surrounding neighborhoods. *To answer residents' concerns and as a guide to transportation policy making, Massport should be required to thoroughly assess potential health effects associated with existing levels of Logan operations on Massachusetts residents.*

Massport lacks a long-term transportation plan that could de-emphasize Logan, and shift our region away from ever-increasing reliance on air travel. In preparing its DEIS, Massport was required to explore all reasonable alternatives. Instead, Massport appears to have looked seriously at only its traditionally preferred alternative: Expand Logan. And, equally, the DEIS reflects the fact that Massport has chosen to needlessly embrace the false notion that reliance on air travel must inevitably always trend upward.

Massport instead must be required to operate within the context of a true long-term transportation plan for our region, one that: (1) makes maximum best use of other airports in our region like T.F. Green and Manchester; but (2) shifts us away from ever-increasing reliance on air travel, and toward transportation alternatives like high-speed rail that have far lower environmental and human impacts.

In closing, one final observation: As someone with over two decades experience as an environmental and community organizer, I have never seen the diverse people of Boston and surrounding cities and towns so united as in their shared opposition to 14/32. As one East Boston resident says within the testimonials attached to these comments: "Enough is just enough."

To me, comments like those, made over and over by so many citizens at meetings and hearings these past few months, speak more eloquently and convincingly than anything else to all that is wrong with Massport's proposal to expand Logan.

Sincerely,



JOHN T. O'CONNOR

OPEN CITIZEN LETTER
TO
GOVERNOR PAUL CELLUCCI &
MASSPORT CHAIRMAN PETER BLUTE

Dear Sirs:

We the citizens of Massachusetts impacted by the proposed changes to **Logan International Airport** demand the following of Massport:

1. A binding and legal agreement which halts any existing plans to expand **Logan Airport** in any way, shape or form. Including but not limited to the completion of the proposed Runway 14/32 and the centerfield taxiway. Instead, we demand a regional transportation plan that addresses New England's long-term transportation needs with less reliance on **Logan.** 117.12 117.13

2. An outside evaluation of **Logan Airport** which assesses performance and makes recommendations for improvements within the existing infrastructure. 117.14

3. Establishment of a citizen's advisory board to serve as a liaison between **Massport** and the effected communities. This board will develop a comprehensive and inclusionary process of mitigation to eliminate the arbitrary, ill-devised process that currently exists. 117.15

4. Appropriation of funds to conduct an Environmental Impact Study which includes an in-depth, long-term study of **Logan Airport's** impact on all surrounding cities and towns within heavily travelled flight paths. 117.16

5. Creation of a Good Neighbor Agreement between residents and **Massport** that requires **Massport** to provide a forum for good faith negotiations. 117.17

Authors and contributors:

John T. O'Connor
President, Greenworks, Inc.

Henry S. Cole, Ph.D.
Henry S. Cole and Associates

Marco Kaltofen, P.E.
Boston Chemical Data Corp.

Peter Alachi, M.S., Biology

Veronica Eady

Testimonials:

Dovi Abbey
Davida Andelman
Tom Briand
Pauline Collins
Gregory Curci
Barbara & Art Flavin
The Horn family
Lolly Lincoln
Robert Massa
Martha Merson
Ian McGlocklin
Brian Monk
Ignacio Ochoa
David Prusky
Richard Salini
Madeleine Steczyski
Rebecca Swope
Mary Thawley
Laurie Webster
Alan Wright

Special thanks to Peter Alachi, MS, and Veronica Eady of Alternatives for Community & Environment (ACE) for their kind permission to include their work here; and to the dozens of Logan neighbors and Massachusetts citizens who helped make this report possible.

CONTENTS:

TAB 1: "Comments of John O'Connor on the Environmental and Human Costs of Massport's Expansion Plan" (O'Connor)

TAB 2: "The Impact of Logan Airport Expansion on Air Quality and Public Health" (Cole)

TAB 3: "Citizen Testimonials Explaining Logan's Impact on Their Lives and Families." (Various)

TAB 4: Appendix A: "Airside Improvement Project; A Draft Environmental Impact Analysis." (Alachi)

TAB 5: Appendix B: "Environmental Justice Concerns" (Eady)

TAB 6: Appendix C: "Summary of Emissions in Airport Expansion Area" (Kaltofen)

Green WORKS
160 Second Street
Cambridge, MA 02142
617.441.0958
www.greenworksusa.com

April 22, 1999

Re: EOEA No. 10458

Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, MA 02202
ATTN: Arthur Pugsley, MEPA Office

Dear Secretary Durand:

I write to urge that you find the Draft EIS presented by Massport in support of its proposed Runway 14/32 "airside improvement" project unacceptable.

The environmental and human impacts of further expansion of Logan Airport—whether through construction of Runway 14/32 or some other scheme yet to emerge from Massport's drawing boards–are simply too high. Nor has Massport made its case that Logan expansion is either a necessary or a desirable solution to our region's long-term transportation needs.

As detailed in the attached documents and elsewhere as well, environmental evidence against Massport's proposal is overwhelming.

Massport's proposal fails on any number of measures: It goes against the most fundamental environmental objective of all, which is to reduce impacts from current levels that are already too high, not merely manage (or allegedly manage) their trend ever upward; it flouts basic precepts of environmental justice that impacts should be distributed fairly across racial and socio-economic lines; it has been pushed forward without sufficient process for citizen involvement or acknowledgement of their concerns; and it seems to beg or sidestep as many questions and issues as it answers.

Specifically:

Massport has been neither forthright nor forthcoming about the true implications and impacts of its present expansion plan; the DEIS, therefore, is not a full disclosure document, as required by federal guidelines. With respect to environmental and human impacts:

Massport fails to consider that 14/32 is a growth-enabler likely to promote (not reduce) increased emissions. In evaluating air quality impacts of proposed runway 14/32, the DEIS adopts an approach that makes no apparent connection between a new runway and Logan's overall ability to handle the increased passenger loads projected by Massport. It's a strange and surprising position given Massport's oft-repeated

claims that delays at Logan will become intolerable to the traveling public without 14/32.

Feedback mechanism. It is probable that construction of a new runway will in fact create new opportunities for growth in airport operations, and consequently, in aircraft and motor vehicle emissions. *Viewed this way, Massport's assertion that air quality impacts from 14/32 are beneficial or negligible is just downright wrong.*

Massport pays scant attention to Logan's role in MA's ozone problem. Eastern Massachusetts is a serious non-attainment zone for ozone, and Logan ranks as a major source of precursors like oxides of nitrogen (NOx) and hydrocarbons that are key ingredients in ozone production. Yet the DEIS explores the issue superficially, despite its own projection that Logan growth will cause significant increases in NOx emissions in coming years. Nor does the DEIS address how Logan-related increases will affect Massachusetts' ability to meet tougher ozone standards slated to take effect next year.

Ground-level ozone. Ground-level ozone is associated with respiratory impairment and illness, especially in children and people with chronic respiratory conditions. *The issue raises concern with respect to residents across eastern Massachusetts, because the ozone impacts of precursor emissions are often greatest some miles from their original source, in this case Logan airport.*

Massport gives short shrift to air pollutants known to have serious health consequences. The DEIS glosses over or ignores key areas of concern with respect to air quality, including hazardous air pollutants, fine particulates, and noise. The medical literature clearly shows that all present serious cause for concern, especially for persons living near Logan airport.

Hazardous air emissions. The DEIS fails to properly consider certain hazardous air pollutants (HAPs) like benzene and formaldehyde that are known or probable carcinogens, through its misleading use of overly-broad categories. Airports are a major source of such HAPS in urban areas.

Fine particulates. Massport's own projections show significant increases in emissions of particulates with diameters less than 10 microns. That is undesirable in and of itself, but worse, the DEIS fails to adequately treat the special concerns associated with particulates of less than 2.5 microns. An increasing body of literature documents the adverse health effects associated with particulate air pollution, including symptoms of respiratory disease such as shortness of breath, cough, and asthma attacks. *Of special concern is the possibility that air quality levels in neighborhoods nearest Logan may be unacceptable already with respect to fine particles.*

Noise. The DEIS and Massport's treatment of noise as largely a nuisance factor to be dealt with only within the confines of narrowly-drawn and ill-defined contours is unacceptable. In fact, the scientific literature shows that noise can be a major health risk. *And, as the testimonials in this report and citizen comments at numerous hearings and meetings make clear, Massport's presumption that soundproofing is a satisfactory "answer" to noise means that whole neighborhoods must live hermetically-sealed lives, in which residents are denied use or enjoyment of their own outdoor property, and are left even unable to open their windows*

Massport understates or omits significant emissions, including motor vehicle traffic. The DEIS omits certain sources of emissions and appears to substantially understate others:

Motor vehicle traffic and emissions. Massport projects many millions of additional passengers using Logan in the years ahead. How will they get there, and what will be the emissions associated with growth in ground transportation to and from Logan? *The DEIS appears to sharply understate these motor vehicle emissions, by assuming—inexplicably—that motor vehicle traffic growth will lag well behind passenger growth; the direct opposite of what has actually proven true in recent years.* Also, the DEIS takes no account of emissions from motor vehicle traffic beyond Route 128

Aircraft emissions above 3,000 feet. The DEIS analysis does not include aircraft emissions at altitudes of above 3,000.

There are some broader, more philosophical points, too, that provide equally compelling evidence against the DEIS and Massport's proposal. Massport appears to have deliberately framed this DEIS and its public arguments in support of a new runway as narrowly as possible, as if this were purely an exercise in airfield design, undertaken in a vacuum, or perhaps some remote desert.

In reality, of course, Logan sits at the center of one of nation's most densely populated regions. *In that context, Massport must be expected to show the same concern for the needs of, and attention to the impacts on, its human neighbors on the ground as it devotes to the passengers on its runways or the aircraft in the sky.*

Yet:

Massport's proposal flouts the tenets of environmental justice, Massport's proposal clearly flouts President Clinton's Executive Order No. 12898, making environmental justice a key criterion. Massport's proposal would further burden racially and income-diverse communities like East Boston, Roxbury, and Chelsea—communities that already face disproportionate and unfair environmental impacts from a number of sources (including, significantly, Logan).

Massport has ignored residents' concerns about potential existing impacts. Many residents of communities around Logan like East Boston, Chelsea, Winthrop, and others have offered serious and thoughtful concerns about potential health effects associated with existing levels of Logan usage. The DEIS fails to address these issues—yet sadly, similar concerns elsewhere have too often proved well-founded. A 1993 EPA study of Chicago's Midway airport, for example, found that certain emissions associated with aircraft operations at that much smaller facility contributed significantly to cancer cases in surrounding neighborhoods. *To answer residents' concerns and as a guide to transportation policy making, Massport should be required to thoroughly assess potential health effects associated with existing levels of Logan operations on Massachusetts residents.*

Massport lacks a long-term transportation plan that could de-emphasize Logan, and shift our region away from ever-increasingly reliance on air travel. In preparing its DEIS, Massport was required to explore all reasonable alternatives. Instead, Massport appears to have looked seriously at only its traditionally preferred alternative: Expand Logan. And, equally, the DEIS reflects the fact that Massport has chosen to needlessly embrace the false notion that reliance on air travel must inevitably always trend upward.

Massport instead must be required to operate within the context of a true long-term transportation plan for our region, one that: (1) makes maximum best use of other airports in our region like T.F. Green and Manchester; but (2) shifts us away from ever-increasing reliance on air travel, and toward transportation alternatives like high-speed rail that have far lower environmental and human impacts.

In closing, one final observation: As someone with over two decades experience as an environmental and community organizer, I have never seen the diverse people of Boston and surrounding cities and towns so united as in their shared opposition to 14/32. As one East Boston resident says within the testimonials attached to these comments: "Enough is just enough."

To me, comments like those, made over and over by so many citizens at meetings and hearings these past few months, speak more eloquently and convincingly than anything else to all that is wrong with Massport's proposal to expand Logan.

Sincerely,

John O'Connor

JOHN T. O'CONNOR

Henry S. Cole & Associates, Inc.
Science and Solutions for the Environment

Suite 800, 2300 M Street, NW, Washington, DC, 20037,
Phone: (202) 973-2827 Fax: (202) 973-2887

Henry S. Cole, Ph. D., President

THE IMPACT OF LOGAN AIRPORT EXPANSION ON AIR QUALITY AND PUBLIC HEALTH

By

Henry S. Cole, Ph. D.
Henry S. Cole & Associates, Inc.
Washington, D.C.

EXECUTIVE SUMMARY

Introduction. Massport proposes to build a new runway for Logan Airport. Its Environmental Impact Statement (EIS) argues that the new runway is needed to reduce delay. However, the EIS also projects a major expansion period for the next decade. Massport forecasts that passenger load will increase from an estimated 29 million in 1999 to from 37.5 million to 45 million passengers by the year 2010. This represents a growth rate from 29 to 55 percent. *Surely, the runway is an important first step to achieving Massport's projections.*

This report finds that the EIS (1) fails to acknowledge the runway's impact on growth and (2) neglects to fully examine the consequences of its projected expansion - consequences that will effect the surrounding communities and the region as a whole. This report focuses on the impacts of Logan expansion on air quality; however, the full set of consequences also include congestion of roadways, noise levels, water quality, and the very livability of greater-Boston area communities.

Logan Airport even at its current size has a major impact on the region.

- Airport has been ranked as the Nation's 12th largest airport with a current annual use rate of approximately 29 million passengers in 1999.

- Logan handles about two-thirds of the passenger load in New England. This airport is also the largest generator of motor vehicle traffic in New England. Traffic jams on the roadways leading to Logan are already legendary.

- The air and auto traffic associated with Logan Airport imposes a variety of environmental stress factors -- including noise and air pollution -- on people living in one of the most densely populated regions of Massachusetts and the nation. (See Fig. 1).

- Logan airport is a major source of air pollutant emissions. VOC's and NOx are particularly important because they contribute to the region's serious non-attainment status for ground-level ozone. (See Section 4). For example, Logan Airport emits more than 7 tons per day of oxides of nitrogen (NOx) which is approximately 7 percent of the anthropogenic NOx emissions in Suffolk County.

The impact of expansion on air quality. Major findings are as follows:

- **Increased emissions of NOx and Particulates.** The Environmental Impact Statement (EIS) for Airside Improvements Planning (February 1999) forecasts that growth in Logan use over the next decade will cause significant increases in emissions of oxides of nitrogen (NOx) and particulate matter (PM10). Ironically, new quieter jets have higher NOx emissions.

- **Increased NOx and its impact on Ozone.** Increased NOx is especially significant. NOx is an essential ingredient for the formation of photochemical smog including ground-level ozone. Massachusetts has been designated by EPA as a "serious" non-attainment zone for ozone. Ozone is known to cause and aggravate respiratory disease in humans. Children are especially vulnerable. Ozone is a regional problem -- Logan NOx emissions affect smog tens of miles from the source. The EIS fails to address the NOx / ozone question in a meaningful manner, for example, Massport has not included emissions caps in its preferred alternative. 117.18

- **Additional impacts of increased NOx.** Increased NOx emissions has additional consequences. It contributes to acid rain which has damaged both waterways and forests in the northeast. Scientists have also determined that NOx emissions to air are a major source of nitrate deposition to coastal waters and estuaries; this results in over-fertilization, oxygen depletion, and severe damage to estuarine ecosystems and fisheries.

- **Hazardous Air Pollutants**. Airports a significant source of hazardous air pollutants (HAPs). An EPA study of Chicago's Midway (much smaller than Logan), found that HAP emissions from aircraft contributes an estimated 10.5 percent of the cancer cases related to air pollution in the 16 square mile area surrounding the airport. Motor vehicle traffic (much of which is attributable to the airport) was the dominant source of cancer risk. A number of these "HAP's" (e.g., benzene, formaldehyde) are known or probable human carcinogens -- they can cause cancer. The EIS fails to assess or project emissions trends for this particularly dangerous component of VOC and fine particulate emissions. 117.19

- **Fine Particulates.** The report presents evidence suggesting that neighborhoods located near Logan Airport may be experiencing dangerous levels of PM2.5, the smallest class of particulates and those having the most devastating impact on public health. Since the EIS projects increased particulate emissions, PM2.5 emissions and ambient levels in the surrounding region can be expected to rise with continued expansion of the airport.

- **Motor Vehicles and Emissions.** Projections of motor vehicle emissions used in the EIS incorporate Massport predictions of future growth in the volume of traffic approaching and using the airport. Massport projects an additional 12,000 cars per week-day over the next decade to accommodate passenger growth. However, Massport data showing the relationship between passenger use and traffic volume over the past five years suggests that Massport is "low balling" the growth in traffic volume needed to accommodate its forecasts. This report shows that a better estimate may be on the order of 30,000 to 50,000 additional vehicles. Using these figures would lead to higher future CO, VOC, NOx emissions than those projected in the EIS. 117.20

- The "emissions gap" problem is heightened by the EIS's neglect of emissions outside of I-95 /128 and aircraft emissions at altitudes greater than 3000 feet. 117.21

Summary. In summary, this report finds that Massport's EIS fails to acknowledge that a new runway will act to stimulate new growth and allow for expansion and is deficient in its assessment of the environmental impacts of Logan expansion. 117.22

In simple terms, neither the EIS, the runway proposal, nor Massport's vision for Logan Airport future is respectful of real world limits -- limits that involve the people who live in area and that involve the environment. Massachusetts has been designated as a "serious" non-attainment zone for ozone. The airport already imposes a burden of fine particulates and hazardous air emissions on the surrounding area, the most densely populated in New England. Massport has failed to demonstrate that increased emissions associated with its projected expansion will not adversely affect public health and the environment. The evidence presented above indicates that the growth projection embraced by Massport will have a serious impact on community health.

Recommendations.

- The State of Massachusetts should reject the current EIS as deficient. Massport and state authorities should replace the current Logan expansion plan with a regional transportation based on energy-efficient inter-city rail and improvement of the many other New England airports. 117.23

- The state should initiate a true stakeholder involvement process to initiate the planning process for a regional transportation plan. Representatives of airport communities, environmentalists, rail and mass transit representatives and their experts should be involved in the process. 117.24

- Massachusetts Department of Environmental Protection should ensure that EIS fully address significant environmental problems. 117.25

1.0 Introduction. Logan Airport has been ranked as the Nation's 12th largest airport with a current annual use rate of approximately 29 million passengers.[1] Logan is also the largest generator of motor vehicle traffic in New England.[2] The air and auto traffic associated with Logan Airport imposes a variety of environmental stress factors -- including noise and air pollution -- on people living in one of the most densely populated regions of Massachusetts and the Nation. (See Fig. 1).

This report focuses on the air pollution impacts of increased use of Logan Airport. The Environmental Impact Statement (EIS) for Airside Improvements Planning (February 1999) forecasts that growth in Logan use over the next decade will cause emissions of oxides of nitrogen (NOx) and particulate matter (PM10) to increase substantially. According to the EIS, emissions of volatile organic compounds (VOC's) and carbon monoxide (CO) will increase if the higher growth rate (to 45 million passengers in the year 2010) are realized.

The EIS clearly shows that the greater the expansion, the more emissions. Emissions will increase because the shear increase in aircraft operations and vehicular traffic projected will overwhelm whatever temporary benefits may result from a new runway and other improvements. Moreover, many of the air pollution impacts associated with increased use will occur in some of the most densely populated regions in the state. (See Fig. 1).

Subsequent sections of this report demonstrate that the EIS for Logan Airside Improvements fails to (a) fully acknowledge the consequences of its "airside improvement plan" on air quality and (b) to adequately examine the health and environmentally-related impacts of the increased emissions that are predicted in the document.

2.0 New Runway - Impact on Emissions. One of the most glaring deficiencies in the EIS is that it fails to consider the impact that the a new runway will have on growth-related emission trends. The EIS takes the position that the new runway and other "airside improvements" are simply modifications that improve efficiency. Massport makes the case that at some given level of passenger use (e.g., 29 million), the new runway will reduce aircraft congestion, idling and planes in holding patterns, improvements that should work to mitigate emissions.

However, Massport's analysis fails to consider that adding a new runway is likely to create a feedback mechanism that will in turn affect the airport's rate of growth. Although, the new runway may initially improve efficiency, it will also provide an opportunity for expanded use.[3] The new runway, is analogous to the highway dilemma. Traffic planners add lanes to relieve congestion, yet fail to predict that they ultimately lead to more bigger traffic jams in the future. 117.26

The EIS report, by failing to use an iterative growth model, presents a flawed assessment of the true impact of the airside improvements over time. Without considering feedback to growth, Massport cannot back its assertion that "the overall impacts associated with the

Airside Project Alternatives are beneficial or will remain imperceptible" from an air quality standpoint.[4]

In fact, common sense dictates that the 29% to 55 % increase in passenger use forecast by Massport for the next decade would not be feasible without the new runway. The new runway is a capacity enhancement that will promote rather than manage growth. And as Section 3.3 shows, expansion has a strong impact on the growth of emissions.

3.0 Current and Projected Emissions for Logan Airport.

3.1 Current emissions. Table 1 is a summary of 1997 air emissions as estimated in the Boston-Logan International Airport, 1997 Annual Update.[5] This table shows estimated emission rates for carbon monoxide (CO), oxides of nitrogen (NOx), volatile organic compounds broken down by sources associated with the airport. (Particulate matter was not included in the GEIR update.)

This table shows that aircraft emissions are the largest single sources of emissions at the airport and contribute more than 80 % of NOx emissions, more than 61 % of VOC emissions, and about 42% of the CO emissions associated with the airport.

3.1.1 Logan Airport as a major emitter in the greater-Boston Area. Logan airport is a major source of air pollutant emissions. VOC's and NOx are particularly important because they contribute to the region's serious non-attainment status for ground-level ozone. (See Section 4).

Logan Airport emits more than 7 tons per day of NOx which is approximately 7 percent of the anthropogenic NOx emissions in Suffolk County.[6]

Logan emits more than 3 tons per day of VOC's which represents approximately 4 percent of the anthropogenic VOC emissions from Suffolk County.[7]

Logan Airport has NOx emissions comparable to emissions from the state's largest industrial and power generating plants.[8]

3.2 Certain emissions not included in EIS inventory. A problem with the EIS analysis is that certain emissions associated with the use of Logan Airport are not considered in the assessment of environmental impact. Thus, the EIS understates the full impact of an expanding Logan Airport.

117.27

Specifically, the analysis does not include aircraft emissions that occur at altitudes greater than 3000 feet. As shown in Sections 4 - 5 emissions of NOx and other pollutants aloft can have a number of adverse environmental impacts.[9] These impacts would be diminished with a shift to energy efficient passenger trains.

- The emission inventory does not include emissions from motor vehicles driving to and from Logan Airport that lie beyond I-95/Route 128.

- The EIS (Feb. 1999) does not include in its emissions inventory or projections certain critical pollutants; these include specific hazardous air pollutants (HAP's) and PM2.5 (the smallest particulates with diameters less than 2.5 microns). As shown in Sections - 6 and 7, these types of air emissions, omitted in the Airside Improvement EIS, are especially significant from a health standpoint.

3.3 Logan Expansion / Emission Trends.

3.3.1 Use Projections. Massport's EIS projects that use of Logan Airport will increase dramatically in the coming decade. Massport envisions two expansion scenarios for the airport:

- Less expansion: passenger use grows from 29 million in 1999 to 37.5 million in 2010.

- More expansion: passenger use grows to 45 million in 2010.

The projected increase in passengers over the next decade is shown on Figure 2.

3.3.2 Emissions Trends. Figures 3-a through 3-d show Massport (EIS) projections of Logan emissions assuming that the airside improvements including the construction of a new runway take place in 1999.[10]

- The Massport projections clearly show a significant increase in emissions for all of the pollutants (NOx, VOC's, CO and PM10) from 1999 to 2010 with Massport's upper projection of *45 million passengers*. The projected increase for NOx is 46 %.

- For the *37.5 million passenger* 2010 projection, NOx (26% increase) and PM10 (6 % increase). For CO and VOC projected emissions decline slightly.

The projected increase in NOx emissions is associated with projected growth in aircraft operations (and ground-level sources) at Logan and to a shift towards new engines with higher NOx emissions.

3.3.3 New Aircraft Engines: Less noise, more NOx. One of the principal measures being touted as a way to reduce noise will ironically work to increase NOx emissions. As Massport acknowledges (EIS 6-73), increased NOx emissions are "an *unavoidable consequence* of phasing in quieter, more fuel efficient engines." While it states that manufacturers are researching ways to reduce NOx emissions, Massport isn't making any promises.

4.0 The Airport, Smog and Ozone. One of the most glaring deficiencies of the EIS is its failure to address the potential impact of emission trends, the associated airport expansion will affect the region's serious ground-level ozone problem.

4.1 Background on photochemical smog and ozone. Box 1 describes how emissions of hydrocarbons and NOx react in the presence of sunlight to form a host of secondary pollutants known collectively as "photochemical smog." The Clean Air Act regulates photochemical smog in terms of the concentration of ground-level ozone. Box 2 summarizes the health and environmental effects of ground-level ozone.

Note that ozone is a regional and not merely local problem; emissions from the airport and aircraft entering the region to use the airport will affect neighborhoods tens of miles from Logan. (See Box 1).

BOX 1. FORMATION OF PHOTOCHEMICAL SMOG / GROUND-LEVEL OZONE.

Photochemistry. Many stationary sources (e.g., factories, power plants) and mobile sources (aircraft, motor vehicles) emit hydrocarbons (e.g., fuels that volatilize) and oxides of nitrogen (NOx). These pollutants, when exposed to sunlight, undergo a very complicated chemistry. The products of the chemistry include irritating gases (e.g., N02 and ozone) and fine particulates that contribute to summertime haze -- the tell-tale sign that the atmosphere is photochemically active.

- Photo-chemical smog, including ground-level ozone, is primarily a warm-season phenomena. The atmosphere reactions are hastened by sunlight and warmer temperatures.

- The distribution of smog is complicated by the fact that freshly emitted NOx can scavenge ozone and reduce its concentration in potent source regions. However, as an urban airmass moves downwind the ozone levels tend to increase -- with highest levels often occurring in suburbs, exhurbs or in rural areas tens of miles from ubran sources.

Ozone - a regional problem. The levels of ozone and other smog constituents are the cumulative product of a myriad of stationary and mobile sources. In fact, highest levels of ozone are often found tens of miles downwind of the most potent urban source regions; this occurs because the precursor pollutants continue to react and form ozone as they move downwind from concentrated source regions.

BOX 2. HEALTH AND ENVIRONMENTAL EFFECTS OF GROUND-LEVEL OZONE

Ozone acts as a powerful respiratory irritant at levels found in Massachusetts during the summer. Exposure to ozone may lead to shortness of breath, wheezing and coughing, and chest pain.

Long-term, repeated exposure to elevated levels of ozone may lead to large reduction in lung function, inflammation of lung lining and increased respiratory discomfort.

According to EPA several groups of people who are at particular risk from high ozone levels:

- people with pre-existing respiratory disease (e.g. asthma, chronic bronchitis, emphysema)
- individuals who exercise outdoors
- people who have a particular sensitivity to ozone.

Children. According to the American Lung Association, children are particularly vulnerable to elevated ozone.

- They spend more time engaged in vigorous outdoor activity and have higher breathing rates
- They have narrower airways than do adults and can experience serious obstructions.
- Air pollution including ozone, can result in more frequent respiratory infections in childhood and increased risk of reduced lung function later in life.

Source: American Lung Association, 1996, Health Effects of Outdoor Air Pollution.

Farms, Ecosystems, Materials. Ozone harms crops and natural vegetation more than any other air pollutant.* The crop loss in the U.S. from ozone has been estimated at several billion dollars.** Ozone also causes widespread damage to a variety of materials including paints, and rubber.

Sources: *US EPA, Air Quality Criteria for Ozone and other Photochemical Oxidants, Vol. 3.
**US EPA, Air Quality and Emissions Trends, 1993, p. 9.

4.2 Logan and Ozone. The EIS's paucity of analysis of the connection between Logan Airport on ozone is especially significant given that:

- Aircraft, airports, and the motor vehicle traffic they attract are major sources of hydrocarbons and oxides of nitrogen (NOx), both are essential ingredients (precursors) for the formation of photochemical smog.

- All of Massachusetts has been designated by U.S. as being non-attainment areas for ozone. More than 5.5 million people live in the Boston-Lawrence-Worster area is (Eastern Massachusetts) characterized by EPA as a "serious" non-attainment zone.[11]

- MADEP evidence shows that a larger number of areas and people are incorporated in the area in which the new more protective ozone standard (state standard) is exceeded. Thus, additional precursor reductions may be needed to fully protect public health.

- Elevated ground-level ozone concentrations cause respiratory impairment and illness -- especially in children and people with chronic respiratory conditions such as asthma and bronchitis (See Box 2).

- Massport projects a 26% to 46 % increase in Logan Airport NOx smog precursors by the year 2010. (See Section 2.0)

- The EIS contains evidence indicating that the particular class of volatile organic compounds that contribute to smog and ozone formation will increase due to airport expansion.. The EIS (Tables also shows a 6% to 29 % increase in modeled concentrations for those hydrocarbons which are photochemically active (described as ozone indicator VOC's in the EIS).

The Massachusetts Department of Environmental Protection (MADEP) has raised concerns about Logan Airport's projected increases in ozone precursors given the state's region's serious non-attainment status for ozone. A MADEP environmental review stated the following

> " ...In 1995, Massachusetts capped NOx emissions at 35% of the 1990 levels from sources greater than 15 MW or 250 mmBtu/hr heat input. A comparison of Logan NOx emissions projected for 1999 indicates that Logan's NOx emissions are comparable to some to the larger sources included in the Massachusetts NOx Allowance Program. In fact, Logan would rank sixth after the largest utility units in a list of 38 applicable units." [12]

In its December 1997 Certificate on the Generic Environmental Impact Report, MADEP recommended the development of air emissions caps and/or an emissions offset program.[13]

4.3 Massport's side-steps the ozone issue. Massport's February 1999 Environmental Impact Statement says almost nothing about the impact of Logan emissions on ozone. With a single paragraph it waves away all regulatory concerns:

> "Based on the results of the emission inventories and the dispersion modeling, the following findings on the effects of the Airside Project alternatives are evident: (1) there are no predicted violations of any State and Federal standards or guidelines under any future scenarios or alternatives; and (2) the overall impacts associated with the Airside Project Alternatives are beneficial or will remain imperceptible." (p. 6-84)

The modeling technique used in the EIS does not incorporate atmospheric chemistry and makes no estimates of the impact of precursor emissions on ozone. The indirect measure used, "ozone indicator VOC's" (projected to increase in the future) is not directly comparable to the ozone standard. Thus, the EIS is deficient with regard to Logan Airport expansion on ozone concentrations; on its health impacts; or on its impact on attainment efforts. In addition, the model (see EIS p. 5-56) is limited to the immediate vicinity of the airport. In contrast, the maximum impact of precursor emissions on ozone is likely to be located many miles or tens of miles downwind from a source. That is why EPA recommends the use of urban airshed and regional models that incorporate both chemistry and transport. 117.28

The report also fails to assess how the increases in NOx projected for Logan Airport will affect the state's ability to meet the new and stricter 8-hour average standard of 0.08 ppm. The new standard, not mentioned in the EIS, will go into effect in the year 2000. Air monitoring data collected by the Massachusetts Department of Environmental Protection indicates that using the new standard places a much higher portion of the state's monitoring locations, counties and people in exceedance areas.

Massport has dismissed MADEP's recommendation for emission caps. It argues that such caps would not be enforceable "since the largest single source of air emissions, aircraft, are beyond Massport's control and most other sources such as tenant vehicles and activities are subject to only indirect influence by Massport." (Ref: Boston-Logan International Airport, 1997 Annual Update (EOEA #3247/5146), August 1998 -- Response to comment: C18.)

Although Massport has taken some steps to curtail non-aircraft emissions (e.g., a limited alternative fuel vehicle program), it has essentially embraced a future that embraces future growth that it acknowledges will result in significant increases in ozone precursors and other emissions.

5.0 The additional impacts of increased NOx emissions. Despite its projections for substantial increases in NOx emissions over the next decade, the EIS fails to address a number a critical issues associated with NOx. These are described below. 117.29

- NOx is an important precursor to acid rain. Acid rain affects both terrestrial and aquatic ecosystems, e.g., acidification of waters, reduction in fish populations, damage to forests and wildlife, and damage to soils, materials, monuments and buildings.[14]

- NOx emissions to the atmosphere are an important source of nitrate deposition to coastal waters. Nitrate deposition contributes to the over-fertilization or nitrification of bays and estuaries; this in turn contributes to algae blooms that can choke off aquatic life by limiting both light and oxygen.[15]

- NOx emissions may also form secondary particulate matter,[16] which can impact the respiratory system (see Section 6).

6.0 Particulate emissions. As stated in Section 3, all of the Massport projections show significant increases in PM10 emissions (particulates with diameters less than 10 microns) between 1999 and 2010. However, the EIS all but neglects to discuss the significance of increased particulate emissions. Particularly important are the smallest particulates, those with diameters less than 2.5 microns (PM2.5). Scientific studies over the past decade indicate that this smallest class of particles are largely responsible for the most serious health effects and for haze which restricts visibility. These fine particulates penetrate deep into the lungs and adverse effects include lung cancer, asthma attacks, chronic obstructive pulmonary disease and restricted activity due to illness.[17] PM2.5 has especially severe effects on children with asthma.[18] EPA has recognized the importance of PM2.5 by adopting new particulate standards based on this measurement.

The EIS projects that PM10 emissions will increase by as much as 29 % over the next decade. The EIS (p. 6-77) acknowledges that aircraft are the dominant source of particulate emissions, representing roughly 90 percent of the Logan total and that "emissions of particulate matter are expected to increase in future years in connection with the forecasted increase in aircraft operations at Logan." However, the EIS falls short in a number of ways:

- The EIS fails to present evidence on the particle size distribution of particles emitted from aircraft. While the PM2.5 ambient air standard is not yet being enforced, the EIS should show estimated projections for emissions of these particles since they have the most devastating impact on health.

117.30

- The EIS should also consider how this particle size distribution is modified as it moves through the urban atmosphere. Mathematical models of particle size distribution in urban air predict that the mass of particles in the range of 0.1 - 1.0 microns should be equal to the mass of particles in the 1.0 - 10 micron range.[19] If this is the case, than a major portion of mass of PM10 should be comprised of particles in the PM2.5 range. This is important because modeled and measured PM10 annual concentrations in neighborhoods close to the airport are in the 20-24 ug/m^3 although within the PM10 standard exceeds the PM2.5 standard of 15 ug/m^3. Thus, it is possible that residents of

the Logan vicinity are breathing air that is unhealthy with regard to the smallest class of particles. The EIS needs to examine this possibility.

- The EIS is also deficient in that it's discussion of particulates neglects particulates formed from NOx and other primary emissions. As noted previously, NOx emissions are also forecast to rise with increasing aircraft operations.

7.0 **Hazardous air emissions.** The EIS fails to consider the environmental impact of non-criteria contaminants, including Hazardous Air Pollutants (HAPs), including benzene an established human carcinogen. One cannot make an adequate assessment of the health impact of these chemicals by lumping them into a single category such as volatile organic compounds or hydrocarbons. Airports are a major source of benzene emissions in urban areas and continued expansion may lead to increased emissions of these hazardous air pollutants (the EIS shows an increase in total VOC emissions for the 45 million scenario from 1999 to 2010).

An 1993 EPA-sponsored study evaluated cancer risks attributable to all air pollution sources in southwestern Chicago. The study found that aircraft flying in and out of Midway Airport represent a substantial source of particulate matter as well as hazardous air pollutants such as benzene, 1,3-butadiene, and formaldehyde. The study found that despite Midway's small size (handling only about 10 percent of Logan's passenger volume) it emitted far greater quantities of hazardous air pollutants than industrial sources within the 16-square mile study area.[20]

- The 1993 EPA study found that 10.5 per cent of the cancer cases associated with HAPs were attributed aircraft emissions. This number does not include additional contributions associated with airport vehicles and motor vehicle traffic associated with the airport. The study found that cars, buses, and trucks in the study area (not all attributable to the airport) were the most important contributors of cancer-causing air emissions (25 percent of cancer cases associated with HAPs).

- The authors of the study state: "it is no surprise that emissions from aircraft engines may have significant impact on people living in the study area, especially to people living at receptors [locations] adjacent to the airport." [Emphasis added].

The Logan EIS presents no information on hazardous air pollutants and their potential impact on cancer rates in surrounding communities. However, Logan is a much bigger airport than Midway and may be reasonably expected to have larger hazardous air pollutant emissions. 117.31

8.0 Traffic Congestion and Air Emissions. The EIS does not sufficiently address the impact of its projected expansion rates on airport traffic. It needs to present an analysis aimed at assessing the impact of increased congestion with worst as well as best case assumptions on measures to mitigate auto traffic (public transit use, HOV lanes etc.). The shear optimism in EIS's forecast is shown in Table 4-4 of the Annual Update for 1997. 117.32

This table shows a 29 percent growth in passengers using the airport between 1999 and 2010 (assuming 37.5 million passengers in 2010). For the same period the Update shows only a 12.3 percent increase in the rate of average annual weekday traffic (AWDT) using the airport.

The problem is that Massport's projections are at odds with the historical relationships between AWDT and passenger levels. Over the past five years, the rate of growth of AWDT has been nearly twice as high as the rate of growth of passengers. The EIS fails to explain how it will manage to reverse the historical relationship. Even with a 1:1 ratio of AWDT to passenger growth, average daily traffic volume would reach nearly 130,000 cars by 2010 for the 37.5 million passengers and nearly 156,000 for the 45 million passenger scenario. Whereas Massport projects an addition of about 12,000 cars per day over the next decade, recent history suggests that the airport and roadways will have to accommodate from 30,000 to 50,000 cars or higher. This indicates that Massport's projected air emissions from motor vehicles may be significantly underestimated.

9.0 Balanced Regional Transportation Plan. The EIS preferred alternative is clearly a capacity enhancement that will help Massport achieve the growth rates that it projects as inevitable. The EIS fails to develop a regional transportation plan as a serious alternative to a new runway and continued expansion. Thus, the EIS cannot be considered to be complete. 117.33

Logan currently handles about two-thirds of the passenger enplanements in New England. The impact of this airport on the environment, public health, and quality of life is concentrated on the most densely populated area of New England. Expansion can only mean greater intrusion in the future. The EIS should develop a preferred regional transportation plan alternative that would focus on expanding the use of energy efficient inter-city rail would promote a regionally balanced spread of airport use. This plan would be specifically designed to reduce noise and pollution levels in the neighborhoods surrounding Logan Airport in the next decade.

ENDNOTES:

[1] In a 1993 NRDC survey, Logan was ranked number 12 in terms of numbers of passengers.

[2] Conservation Law Foundation, Letter to Trudy Coxe, Nov. 24, 1997.

[3] Consultants to the Community Advisory Committee (CAC), Review Comments on Draft Environmental Impact Report, DEIS/DEIR, for the Logan Airside Improvements Planning Project, Feb. 1999. According to this document: the construction of the runway may not increase peak hour capacity, but will provide controllers with the opportunity to increase throughput by using higher-capacity configurations more of the time. While the stated purpose of the new runway is to reduce weather-related delays, the new runway would also increase the all-weather capacity of the airport. Notably, Massport's has not included in its preferred alternative an option for "peak hour pricing" which acts to manage rather than to invite new capacity.

[4] EIS, Feb. 1999, p. 6-84.

[5] Boston-Logan International Airport, 1997 Annual Update (EOEA#324/5146), August 1998.

[6] Suffolk Co. NOx emissions: Massachusetts DEP, 1977, Revised base year emission inventories. Airport is the Low 29 M, scenario for 1999 in the EIS (1999).

[7] Suffolk Co. VOC emissions: Massachusetts DEP, 1977, Revised base year emission inventories. Airport is the Low 29 M, scenario for 1999 in the EIS (1999).

[8] Lipman, S. G., Department of Environmental Protection's consolidated comments on Logan Airport, Nov. 24, 1997.

[9] The NOx emission estimates contained in GEIR and EIS tend to underestimate the full extent of NOx emissions because the conventional practices is to include only those aircraft emissions which are emitted at ground-level and in the first 3,000 feet of take-offs and landings. However, NOx emitted at higher levels can contribute to a number of environmental problems including regional and long-range transport associated with multi-day ozone episodes, acid rain, and nitrate deposition.

[10] The EIS projects two emissions scenarios for each passenger growth projection -- "high" and "low." The low projection assumes more jets and larger aircraft, but has a lower number of flight operation, relative to the "high" operations scenarios. In the following section we used the "high" operations scenario to track emissions levels.

[11] Ozone, Carbon Monoxide, Particulate Matter, Sulfur Dioxide, Lead Areas Designated Nonattainment, US. EPA, Office of Air Quality Planning and Standards, August 4, 1998.

[12] Lipman, S. G., Department of Environmental Protection's consolidated comments on Logan Airport, Nov. 24, 1997.

[13] Coxe, Trudy, Certificate of the Secretary of Environmental Affairs, on the GEIR Report Annual Update, Dec. 1, 1997.

[14] U.S. EPA, Environmental Fact Sheet, Adopted Aircraft Engine Emission Standards, April, 1997.

[15] NRDC, Flying Off Course, October, 1996, p. 40. The algae prevents light from penetrating to deeper waters; as algae dies and decays large amounts of dissolved oxygen are consumed by microbes.

[16] U.S. EPA, Environmental Fact Sheet, Adopted Aircraft Engine Emission Standards, April, 1997.

[17] Dockery, Douglas W, et al., "An association between air pollution and mortality in six U.S. cities, New England Journal of Medicine, Dec. 1993, p. 1759.

[18] American Lung Association, Health Effects of Outdoor Air Pollution, 1996, p. 17.

[19] Williamson, S. J. Fundamentals of Air Pollution, Addison Wesley Publishers, 1973, P. 358. This distribution assumes that particles (regardless of size) have about the same density.

[20] U.S. EPA, Region 5, Air and Radiation Division, Estimation and Evaluation of Cancer Risks Attributed to Air Pollution in Southwest Chicago, Final Summary Report, Prepared by ViGYAN, Inc. April 1993.

1996 POPULATION DENSITY BOSTON METROPOLITAN AREA



Figure 1

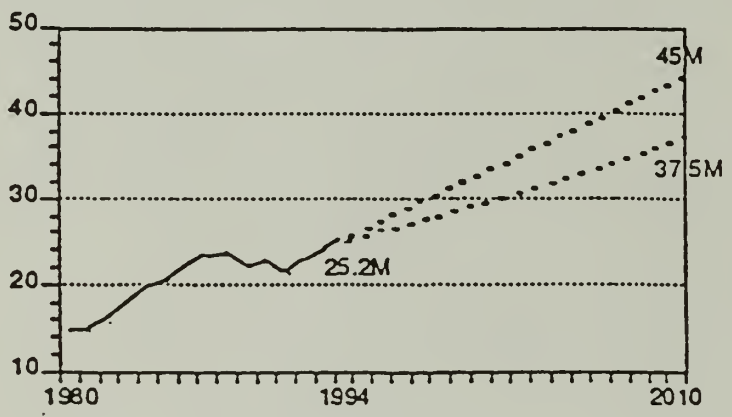
Persons per Square Mile

- More than 30,000
- From 10,000 to 30,000
- From 3,000 to 10,000
- From 1,000 to 3,000
- Fewer than 1,000

Total Persons: 4,122,000

Figure 2

The 2010 Fleet Forecasts were Developed for
Two Alternative Passenger Volumes:
37.5 Million and 45 Million



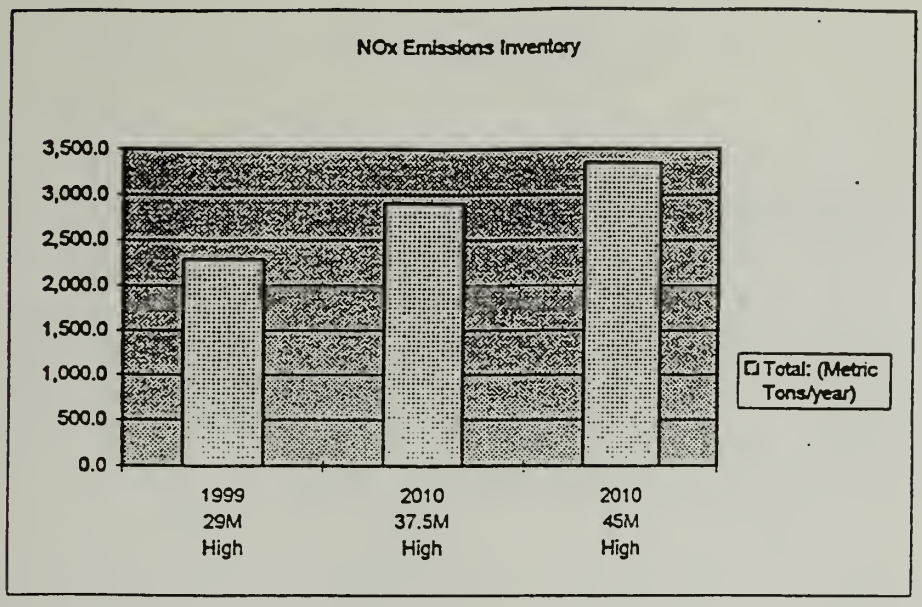
Avg. Annual Growth	
1980-1994	3.8%
1994-2010 (37.5M)	2.5%
1994-2010 (45M)	3.7%

Other Long-Term Forecasts

	U.S.	Transatlantic
FAA National Forecast	4.0%	5.2%
Boeing	4.0%	4.3%
McDonnell Douglas	4.0%	4.0%

Source: Draft Environmental Impact Statement/Report (Vol III), Logan Airside Improvement Project, Feb. 1999

Figure 3a Projected NOx Emissions for Logan Airport



NOx EMISSIONS INVENTORY

Year and Case:	1999 29M High	2010 37.5M High	2010 45M High
Total: (Metric Tons/year)	2,290.7	2,899.9	3,344.9

Note:

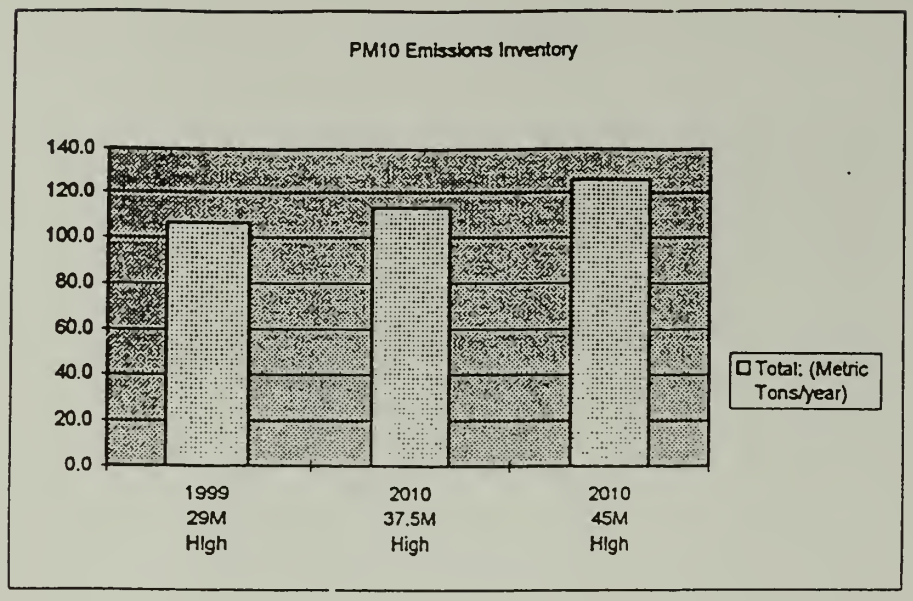
All Totals associated with the following emissions data:

On-Site - Includes aircraft sources, ground equipment, onsite motor vehicles, and other miscellaneous sources.

Off-Site - Includes airport-related motor vehicles in the East Boston and Regional Study Areas.

Source: Draft Environmental Impact Statement/Report (Vol 1), Logan Airside Improvement Project, Feb. 1999

Figure 3b Projected PM10 Emissions for Logan Airport



PM10 EMISSIONS INVENTORY

Year and Case:	1999 29M High	2010 37.5M High	2010 45M High
Total: (Metric Tons/year)	106.2	112.8	125.9

Note:

All Totals associated with the following emissions data:

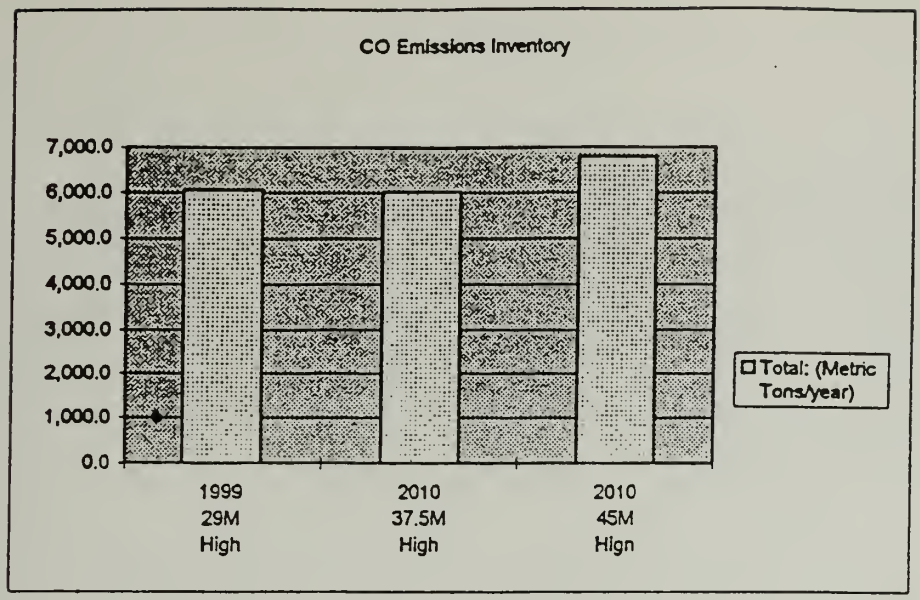
On-Site - Includes aircraft sources, ground equipment, onsite motor vehicles, and other miscellaneous sources.

Off-Site - Includes airport-related motor vehicles in the East Boston and Regional Study Areas.

Source: Draft Environmental Impact Statement/Report (Vol 1), Logan Airside Improvement Project, Feb. 1999

Figure 3c

Projected CO Emissions for Logan Airport



CO EMISSIONS INVENTORY

Year and Case:	1999 29M High	2010 37.5M High	2010 45M High
Total: (Metric Tons/year)	6,053.2	6,015.9	6,781.3

Note:

All Totals associated with the following emissions data:

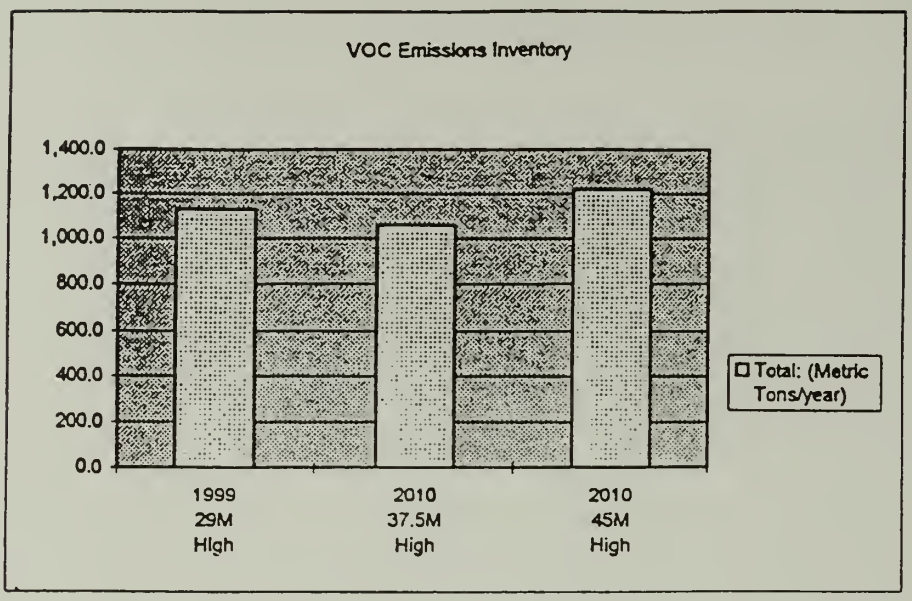
On-Site - Includes aircraft sources, ground equipment, onsite motor vehicles, and other miscellaneous sources.

Off-Site - Includes airport-related motor vehicles in the East Boston and Regional Study Areas.

Source: Draft Environmental Impact Statement/Report (Vol 1), Logan Airside Improvement Project, Feb. 1999

Figure 3d

Projected VOC Emissions for Logan Airport



VOC EMISSIONS INVENTORY

Year and Case:	1999 29M High	2010 37.5M High	2010 45M High
Total: (Metric Tons/year)	1,129.3	1,057.8	1,219.1

Note:

All Totals associated with the following emissions data:

On-Site - Includes aircraft sources, ground equipment, onsite motor vehicles, and other miscellaneous sources.

Off-Site - Includes airport-related motor vehicles in the East Boston and Regional Study Areas.

Source: Draft Environmental Impact Statement/Report (Vol 1), Logan Airside Improvement Project, Feb. 1999

Table 1

1997 Estimated Emissions (in kg/day) at Logan Airport

Source Categories:	CO	NOx	VOC
Aircraft Sources			
Air carries	4,698	4,150	1,227
Commuter	700	159	498
Cargo aircraft	514	262	207
General aviation	654	21	27
Total aircraft sources	6,636	4,592	1,959
Ground Service Equipment	6,098**	622**	530**
Airport-Related Motor Vehicles			
Parking /curbside	586	24	102
On-airport vehicles	1,283***	244***	205
Total motor vehicle sources	1,869	268	307
Other Sources			
Fuel storage/handling	0	0	381
Miscellaneous sources+	37	244	6
Total other sources	37	244	387
Total airport sources	**14,640**	**5,726**	**3,183**

** Includes vehicles converted to alternative fuels

*** Includes through traffic from the Ted Williams Tunnel

Note: Particulate (PM10) emissions for the above source categories were not provided in the Source document.

Source: Boston-Logan International Airport, 1997 Annual Update (EOEA #3247/5146), August 1998



Lauri Webster, East Boston
"Sometimes the noise is so bad my husband and I pack the house and leave, just because we can't take the noise any more. It's pathetic-I can't even stay in my own house.

"The blast of the engines crescendos to 95 decibels every 90 seconds as each plane takes off. The screeching and squealing makes me clench my teeth. Each plane thunders down the runway, shaking the windows of the house, vibrating china in the closet and tilting pictures on the wall.

"The noise wakes us up early in the morning and pounds away while we get ready for work. Every night it destroys the peace when we come home from a long day. It makes me irritable and I snap at my three year old. And sometimes this noise goes on for days-sometimes weeks-without a break.

"When the wind changes and peace returns to my neighborhood, it is delightful. Unfortunately, I know that the planes are torturing friends in other neighborhoods and surrounding cities and towns.

"The smell of jet fuel smell knows no boundaries either. It hits me in the face the second the train doors open at Orient Heights T station, and follows me up the hill as I walk home. I can't always escape it once I get inside either, even if I put my head under a pillow.

"I wish I could feel good about this airport expansion project, but I do not. I believe that air travel is still in its infancy, and that everything about it is going to get bigger and faster, and there is going to be more of it. It seems like we ought to be defining some boundaries and setting some limits, like a parent does for a child. One region can only take so much."

Dovi Abbey, Roxbury
"The sleep deprivation is terrible. There are times when I have five consecutive days of planes over my house, going as late as two or three a.m. and starting as early as six in the morning. After five days of that you feel like you're in a war zone. They're turning Boston into Baghdad."



Martha Merson, Jamaica Plain
"My neighborhood has an active Crime Watch. We have organized to get rid of a drug problem, and if we had a truck load of garbage delivered to our street, we would find a way to clean that up too. But the kind of pollution Massport is planning to direct our way can't be contained. It has to be stopped before it starts.

"The people of Boston have done so much work to make our neighborhoods livable; we don't need Massport to turn them into a war zone."

Alan Wright, Roslindale
"I live next to the Arnold Arboretum, a sanctuary in the city. Noisy flights coming off Runway 27 make it unbearable already. Runway 14/23 will triple the overflights and ruin the Arboretum for all our citizens. Massport should restrict or ban older jets, in addition to developing a quality of life master plan for the region. "

117.34

Barbara Flavin, Winthrop
"Honestly, my dream is just to be able to go to bed early, sleep through the night, and wake up late. Due to Logan Airport and the planes, I am unable to do that."

Rebecca Swope, Chelsea
"I'm a first-time homebuyer. I've lived in Chelsea all my life and finally got the money for a home on Tudor Street. I'm doing it all over, but now in my new house I get woken up at two or three in the morning. I can't get any sleep at night!



"I fall asleep during the day. It's been so bad that I'm thinking about moving out of my own home. I never had tension headaches before, but I do now-all thanks to Massport."



Ian McGlocklin, Brookline
"Pollution is becoming an increasingly vital issue for people's health today. More runways mean more plane traffic which means more pollution and greater environmental damage. When will it stop? It should now!" 117.35

Brian Monk, Back Bay
"I'm a college student and can only afford cheap housing. Because of this, my apartment walls are very thin and I hear the "T' and the airport noise all night long, so it's difficult to sleep."

Dave Prusky, Chelsea
"I'm over 60 and retired. I'd like to live out my life in peace and quiet, but Massport's got different plans. The planes are so low over my house that if I were to throw a rock, I could hit one. I'm already partially deaf in my right ear, and I attribute this to having airplanes overhead all the time.

"In my neighborhood, we get a lot of small plane noise. Why is it that I have to pay for an HOV lane on the Southeast Expressway that I can't use, but Massport says it can't limit puddle jumpers' access to Logan? Why not an "HOV airport?" 117.36

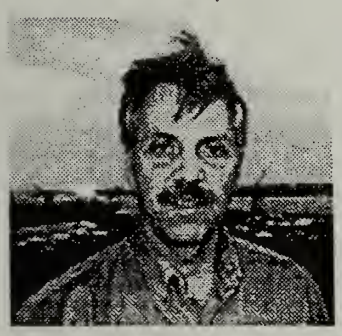


Tom Briand, East Boston
"My family has lived in East Boston longer than the airport has been here: over one hundred years. We live in the city-and we love the living in the city-so we expect some noise and traffic. But the growth of Logan is swallowing up a community that has already suffered too much from Logan's expansion. This is our community. This is our neighborhood. This is where we want to raise our kids. Enough is just enough."

Davida Andelman, Dorchester
"Over the last year or so, I've noticed that the noise from Logan over Dorchester has gotten dramatically worse: early in the morning, early in the evening and late at night. It disturbs me when I'm listening to the six o'clock news, when I'm trying to go to sleep, and in the morning when I might want to sleep later. This interferes with my quality of life.

"This is the one issue that can unify all of Boston's neighborhoods. I go to a ton of community groups and meetings, and I haven't heard one person say they think Logan needs another runway."

Robert Massa, Winthrop
"We've lived in the same house for 32 years, and during that time we've had two dogs that have spent most of their time outside in our yard. The first one went deaf at age twelve, and now our current dog is deaf also. If the noise did that to our pets, what's it doing to us?"



Richard Salini, East Boston
"One of Massport's contractors wanted to dump a load of contaminated dirt on the park near my house. It's a great park. I said, you are not putting that dirt on our park. They said, yes we are. Massport would have allowed it to happen too, if our community meeting hadn't stopped them.

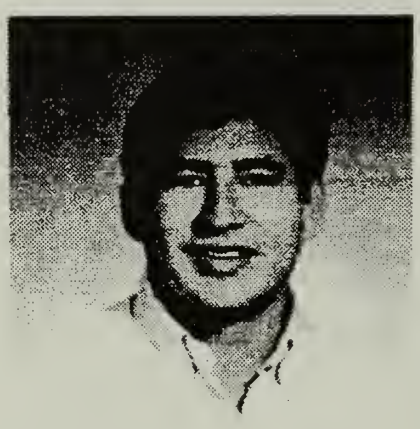
117.37

"Why does Massport calculate the value of passengers' time lost to delays, but ignore the economic costs Logan imposes every day on its neighbors? Every time I drive, I hit traffic associated with the airport, wasting gas, and the aircraft exhaust that covers my car forces me to get my car washed constantly. At home, I have to keep my windows closed year-round, requiring me to keep the air conditioning running all summer long. These add up to hundreds of dollars a year in extra costs due to the airport that I must pay out of my own pocket."

Ignacio Ochoa, East Boston

"I moved from Guatemala to East Boston five years ago. I like East Boston because it is a friendly, safe, ethnically diverse and affordable community that is very convenient to downtown. My wife and I bought a house on Eagle Hill and have worked very hard to renovate it. As soon as we moved in we realized that it is under the flight path of Runway 33.

"Planes wake us up at 6 a.m. and fly continuously (a plane every 1 to 3 minutes) all day and into the night-often past one in the morning. Besides the planes that fly over us we hear the constant ground noise of planes preparing to take off and land. The planes line up one after the next and the background roar never stops. 117.



"My wife called the Massport soundproofing program and they sent us a blurry map with no street names and a letter telling us that we did not qualify for sound proofing. Massport says our home lies four houses away from the noise contour lines which Massport presently utilizes.

117.3

"Because of Logan, East Boston's air quality violates the Federal Clean Air Act and we have some of the highest rates of respiratory infections in the state. How can Massport advocate building a runway that will triple the amount of planes going over our home? Regional planning-not runway expansion-should be implemented immediately. What is Massport's plan to help abutters live with the present noise and contamination? 117.4 117.4

"In Guatemala, human rights abuses are common. Development projects with undesirable impacts-garbage dumps, toxic waste sites and highways-are always built next to working class communities. In Guatemala, if we speak out against unfair policies and development projects we risk imprisonment or death. But justice is supposed to prevail in the United States, even when the interests of working-class and minority people conflict with the profit interests of big businesses. For this reason, I am a member of Communities Against Runway Expansion (CARE), and am speaking out in the hope that Runway 14/32 will never be built."

Lolly Lincoln, Cambridge
"I live in Cambridgeport and now that I'm home with my kids I'm really aware of the airport, because we get a lot of small planes with really loud engines. My one year old son's bedroom is under the eaves, and the noise has woken him up many times. On nights when the wind is from the east, I hear them one after another. Some days it's relentless, and even the china cabinet shakes.

"I'm also concerned about the air pollution from the planes overhead. Is anyone thinking about the effects of that?"

117.42



Pauline Collins, Hull
"I live on a hill in Hull and can see the planes going by my windows. My whole house shakes. I oppose the pollution-noise and chemical-that Logan currently generates, so we certainly don't need more runways at the airport. We need a regional plan to save the neighborhoods around Boston Harbor."

Art Flavin, Winthrop
"Now that I'm retired, I should be able to choose when I'm going to work and when I'm going to rest. However, Logan airport makes sure that I wake up by 6:30 in the morning and that I not go to sleep before 11:30 at night. Naps are out of the question. But according to Massport, the neighborhood should be serene because the so-called average noise level is well within their limits.

"Last spring, we had a meeting last spring with Massport and FAA to discuss quality of life issues and we couldn't hear ourselves speak. Winthrop town hall is a brick and granite building but it was a hot night and we had the door open. It was either leave the door open and be drowned out by the airplane noise, or have our meeting but roast in the heat.

"In theory, my own house isn't supposed to be under any flight path, but when the wind is blowing a certain way, I can't even use my front porch."



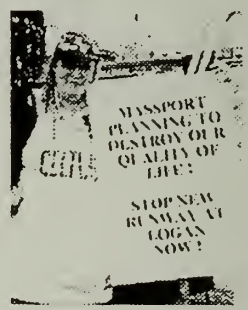
Madeleine Steczynski, East Boston
"I have lived in East Boston for eight years. In my time here I have learned what incredible struggles the residents of this neighborhood have had to go through. My opposition to the runway is based on two facts:

"Planes flying over my house at night have been so loud that I awake and think we are at war. Car alarms throughout the entire neighborhood have been set off.

"Also, I work with the kids of East Boston. They deserve a better future!"

Mary Thawley, South End

"Sixty thousand jets over the South End are going to cause air pollution and if they want to fly any lower, there'll be no quality of life. You'll be able to grasp the wing and hitch a ride."



117.43

Gregory Curci, Winthrop
"Eight years ago when I moved into my house in Winthrop, I could hear the airport, but now with the increase in air travel I can also smell the jet fuel, and tires burning from the landings. I'm not supposed to be under any flight path, but there are times when I see three planes crossing simultaneously over my house at different altitudes.

117.44

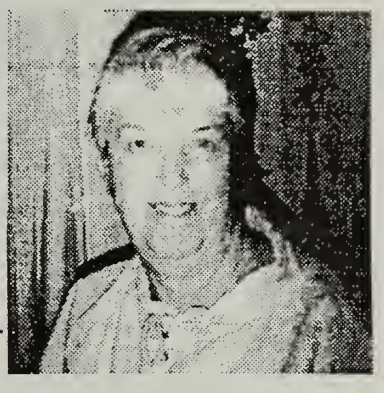
"I'm also starting to get smoke from the airport which hadn't happened before. So my home is no longer safe from the impact of the Logan."



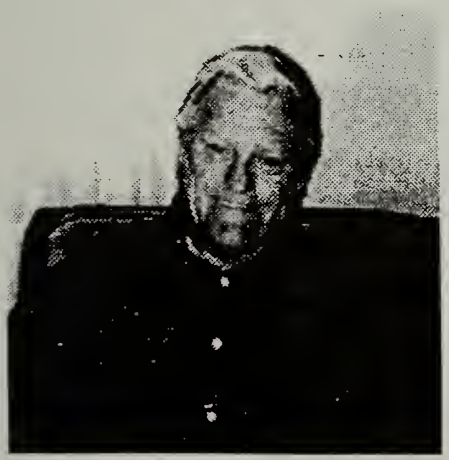
Susan Horn, East Boston
"My sister has asthma, my mother has asthma. Now I have asthma. It makes you wonder that of a family who grew up in the same house near the airport, at least three of us have gotten asthma."

117.45

Bobbie Horn, East Boston
"I've lived in this house almost my entire life. This is a nice place to live-except for the airport. We have soundproofing but it doesn't really improve your quality of life; it just takes the edge off. And already we've had to replace more than a dozen of those windows that have broken. The noise is so bad that the day before I had a party for my daughter, I was actually hoping it would be cold so there'd be a reason to keep the windows closed.



"Sometimes the planes come in so low they clip the treetops. The worst was a day several years ago when they brought the planes in just barely skimming over our roofs. It was so frightening that everybody around here ran out of their houses. "



Arthur Horn, East Boston
"My big problem with Massport is their credibility. They tell you one thing, then they try to do another. They bend the rules when they need to, and obey them only when it's convenient. So when Massport tells people in the Bayswater Street area that 14/32 will cut the traffic over us, it may-for a brief a time. But as soon as air traffic grows enough, they'll send the planes back to us, and at even higher levels."



AIRSIDE IMPROVEMENT PROJECT

A DRAFT ENVIRONMENTAL IMPACT ANALYSIS

By

Peter Alachi, MS, Biology
palachi@lynx.neu.edu

Monday, April 19, 1999

SUMMARY OF MASSPORT'S AIRSIDE IMPROVEMENT PLANNING PROJECT

The Draft Environmental Impact Statement and Draft Environmental Impact Report (Draft EIS/EIR) considers the impact of five options on flight-delay reduction and weighs the environmental impact of each. The proposed schemes, called actions in draft report, comprise:

- Constructing and operating a 5,000-foot unidirectional runway (14/32) located at the southwestern edge of the airport for use over the water only. The runway length was selected over a 4,500-foot length in order to accommodate a greater proportion of the regional/commuter carrier fleet and therefore more effective in reducing delay (I:3-1).
- Constructing and operating a 9,300-foot Centerfield Taxiway between runway 4L/22R and 4R/22L.
- Reconfiguring, improving, realigning and extending other Taxiways
- Reducing approach minimums on some runways (15R, 22L, 27 and 33L) by providing precision approach guidance to a point closer to runway touchdown. This will reduce delays and enhance operational safety.
- Peak Period Pricing or landing fee surcharges imposed on carriers during peak flight activity levels and as a result of airline over-scheduling.

The planned project was picked from a list of 5 options or alternatives (I:ES-16 - Table 1).

TABLE 1 - SELECTION OF PROPOSED ACTIONS AND DELAY REDUCTION

Alternative	Proposed Action	Percent Reduction of Delay for Year 2010 per 37.5M Passengers (Low Fleet)	Percent Reduction of Delays for Year 2010 per 37.5M Passengers (High Fleet)	Status
1	All actions	-34.1%	-53.6%	Rejected
1A	All actions without Peak Period Pricing	-29.9%	-31.3%	Accepted
2	All actions without 14/32	-14.1%	-42.7%	Rejected
3	All actions (operational and administrative) but no build	-10.3%	-41.3%	Rejected
4	No actions - allows routine maintenance and annual minor improvements	-	-	Rejected

* Based on table 4.5-2 (I:4-30) and bar graph figure ES-4 (I:ES-19).

Peak Period Pricing was not considered since current flight activity levels and over-scheduling do not exceed current airfield capacity (I:3-39).

Construction traffic during the 2000-2004 period will generate a daily average of 129 (ES:ES-27) truck round trips (range 58-580/day). Routes 1A and the Ted Williams Tunnel will be used as the major gateways. Certain designated routes on State highways would "minimize the impact on local streets" (I:ES-29).

Runway 14/32 would be permitted to operate as a unidirectional runway with all arrivals and departures occurring over Boston Harbor. As a result 15% of total airport operations would shift from flight paths over communities to flight paths over the water (I:ES-4). Upon completion, the project will reduce impacts for the most severely noise-affected communities in East Boston, Revere and Winthrop (I:ES-30).

SUMMARY OF PROJECT ENVIRONMENTAL DATA

Logan Airside Improvements Planning Project (EOEA #10458) looked at 2 areas:

- Addressing Logan's delay problem
- Enhancing safety

The two plans will be achieved with *minimal* environmental impact (I:ES-5 - Table 2).

TABLE 2 - SUMMARY OF DRAFT EIS/EIR 'S ENVIRONMENTAL IMPACT AND MITIGATION

ISSUE	DRAFT EIS/EIR STATEMENT
Noise	1. 14/32 will provide more equitable noise distribution and mitigation measures to most affected communities. 2. Communities at 65 decibels will experience a noise increase of 2%. Soundproofing will be provided. 3. Proposed plan will not affect normal activity or aesthetic value of a public park, refuge or historic sites. 4. The Taxiway system will reduce ground noise.
Air Quality/Odors	1. Air quality will improve due to 14/32 added shorter delay periods, and the Taxiway system. 2. Ambient levels of Carbon Monoxide, Nitrogen Dioxide, and volatile Organic Compounds are expected to be well within the air quality standards and are below of all considered alternatives.
Terrestrial Vegetation and Wildlife Habitat	The runway and taxiway constructions will result in the total loss of 39.4 acres of vegetation, leaving behind a total of 440 acres. See also Table 5.4-1 (I:5-60) for a list of avian species within the Logan airfield.
Endangered and Threatened Species of Flora and Fauna	The construction of the Centerfield Taxiway between runways 4L/22R and 4R/22L will result in loss of upland sandpiper (Bartramia longicauda) habitat. A plan with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) will mitigate this impact.
Soils	The reportable concentrations of S1 and S2 soil categories were exceeded in some of the soil samples for arsenic, lead, and two polynuclear aromatic hydrocarbon compounds (I:5-71 and Table 5.6-1 - I:5-72)
Water Quality	Class SB water quality standards are being met under average conditions (Table 5.5-1 - I:5-66).
Wetlands	No federal or state wetlands occur within the airfield study area (I:5-58).
Construction Impact	The construction-related work will be alleviated through "initiatives to limit traffic, noise, and air quality impacts in surrounding communities."

RESPONSE NOTES

There are legitimate questions to be reckoned with as they pertain to nearby communities' expectations. Any Logan improvement should be done in a sensible manner that will not compromise the environment, impact further on our health, irreparably disrupt our lifestyles, or detract from our property values. The submitted report contains numerous deficiencies that fail to compare the benefits of alleviating delays and cutting airline costs to the true environmental, social, economic, and medical costs of the selected scenarios. This report weighs environmental and medical impacts as compared to delay impact.

• Noise Pollution Impact

1. One of the most frequent complaints of local communities' residents is noise. The FAA's threshold of 65 decibels does not accurately assess how many people are disturbed by aircraft noise. The National Resources Defense Council (NRDC) confirmed that Denver International Airport, despite the relatively few people living within its 65 decibel noise contour, receives the highest number of monthly noise complaints from outside this area[9]. Noise can cause serious health problems. It acts as a biological stressor by eliciting a response from the brain's reticular activation system that prepares the body for "fight or flight". Neural impulses then travel throughout the central nervous system and influence perceptual, motor, cognitive, behavioral, glandular, cardiovascular, and gastrointestinal functions. Therefore, noise is thought of as a *major* threat to human health[7]. 117.46

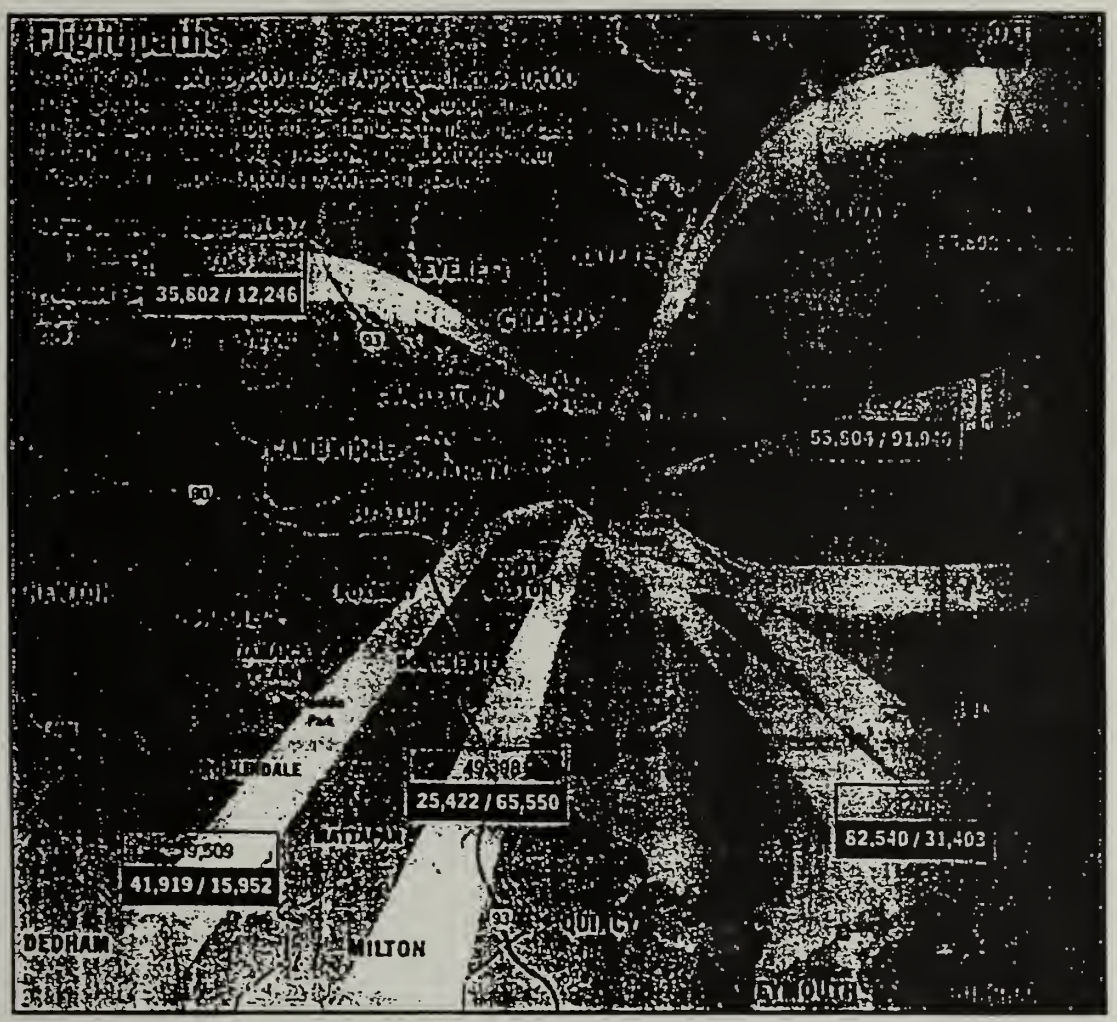
   The constant roar from jet aircraft can seriously affect the health and psychological well being of children, according to a Cornell University study[8]. Gary Evans, a professor of design and environmental analysis in Cornell's College of Human Ecology concluded that there are health problems resulting from chronic airport noise, including higher blood pressure and boosted levels of stress hormones, which may have lifelong effects. Evans contends also that New York children living near an international airport tended to be poor listeners and did not read as well as matched children in quiet schools. Mark Lawrence, an East Boston resident, who currently lives in Florida, recalls[13]:

   > "I REMEMBER being scared out of a deep sleep as a child as a jet would pass over my house so close you could see the pilot's face.
   > I REMEMBER how each year as a student all my teachers would have to pause every 5 or so minutes to allow the screeching jets to pass.
   > I REMEMBER not being able to concentrate in school because of jet noise."

   As many as 115 flights an hour pass over communities north and south of Logan Airport. In a joint public meeting by Massachusetts Environmental Protection Agency (MEPA) and the Federal EPA, Elaine McGrath of Chelsea told the board that, "The communities are speaking with one voice and telling you it's *unbearable*. Massport isn't telling you that"[19].

2. No remedy was given for the structural damage due to low-flying aircraft vibrating homes, school buildings, monuments, and industrial infrastructures within the affected communities. 117.47

3. The following flight path map obtained from the Boston Globe shows the projected impact comparing 1997, and 2001 with or without the new runway.



One obvious problem with this map's projections is that 14/32 will not be completed by 2001. According to a Massport spokesman, Jeremy Crockford, the approval process alone could take two years[20]. But a less obvious issue revolves around the increased fleet capacity projected by 2010. The numbers are therefore meaningless since those communities that are promised a relief for 2001 will not see it materialize in time and will be drowned by an eventual increase in total flights that supercedes the current level. Furthermore, if the plan is implemented, there will be a disproportionate and exorbitant increase in flights over poorer communities such as sections of Chelsea, East Boston, Everett, and Roxbury. The latter fact triggered U.S. Representative Joseph Moakley to argue that the impact statement did not address the environmental effects of the new runway on minority and low-income people in Boston that was required by a 1994 executive order issued by President Clinton[15]. 117.48

4. The Harbor Islands recreational area will suffer significant noise impact. 117.49

- Chemical Emission/Impact

Chemical pollutants emitted include cumulative chemicals generated by vehicles within the airport area, such as planes and transport vehicles, as well as road traffic leading to and from the airport.

1. Since the pollution emission predictor uses 1993 as a contrast item, an overcrowded airport year and a peak year for delays, the predicted emission reductions for year 2010 are undoubtedly minimized to favor a lesser environmental impact. Furthermore, the model predicts minor gains in reducing the levels of pollutants in the environment. But, the proposed action model predictor uses alternative 1 to attain this analytical profile (IV:Tables EI1-1-EI1-4). Since plan 1 was rejected in favor of plan 1A, these data do not necessarily fit the report's final conclusions (see Tables 1 and 3 in this report). 117.50 117.51

2. The additional combustion of gasoline and oil will increase the total Volatile Organic Compounds or Hydrocarbons (VOCs) in the atmosphere. VOCs are considered to be photochemical pollutants; a concentration of 3 ppm can result in 0.1 ppm of photochemical oxidants, a class of pollutants that includes both hydrocarbon and nitrogen derivatives. 117.52

3. The EPA's regional administrator stated that "... the number of passengers using the airport is projected almost to double current levels by 2010" (II:1). The projected increase in passenger volume to 45 million by 2010 will have an adverse effect on the local transportation and air quality by increasing the overall level of ozone in the airport region and on roads leading to the airport. Reducing ozone precursors, which includes nitrogen oxides is necessary to help the State attain the health standards for ground-level ozone (smog). Nitrogen dioxide (NO_2) is a pollutant that in concentrations as low as 0.25 ppm for one hour can blanket the horizon with reddish-brownish haze. Smog formation is initiated by the photochemical decomposition of NO_2 to NO + O. The resulting oxygen atoms then react with the more abundant species O_2 resulting in ozone (O_3). Oxygen atoms and Ozone molecules are also highly reactive with hydrocarbons, and a variety of products are eventually formed, including alcohols, ketones and aldehydes. The eye irritation, which is a familiar feature of photochemical smog, is due to the presence of compounds such as formaldehyde and acrolein. Both NO and NO_2 can also react directly with unsaturated hydrocarbons resulting in Methyl Nitrate and Peroxyacetyl Nitrate (PAN), both of which are powerful eye irritants[23]. 117.53

4. Local airport traffic will also add to the problem of Carbon Monoxide (CO) emission. CO is found at normal levels between 0.025-1 ppm. In major cities, it ranges from 10-50 ppm. CO reduces the ability of the blood to transport oxygen though the body. The resulting strain on the heart and lungs can be fatal. CO can also cause dizziness, blurred vision, and distorted perception of time. 117.54

5. Sulfur Oxides, which occur chiefly as Sulfur Dioxide, Sulfur Trioxides, Sulfurous and Sulfuric Acids, can damage vegetation, fabrics, metals, and ecosystems such as lakes and ponds. Levels of 0.25 ppm or above cause irritation to human beings. Concentrations between 0.08 and 0.1 ppm for any length of time are considered unhealthy. It takes usually about 5 ppm of SO_2 for 1 hour to cause irritation to human throat and lung tissue, with accompanying bronchial constriction. But in individuals who suffer from chronic respiratory diseases, a minor increase in the concentration of SO_2 from 0.1 to 0.2 ppm can cause them to start coughing and experience severe difficulties in breathing[23]. Sulfur Dioxide is a heavy

noxious gas that can very quickly combine with water to form Sulfurous Acid (H_2SO_3). Also, Sulfur dioxide can absorb a photon of light and becomes "excited" so that if it collides with an O_2 molecule, it forms sulfur trioxide (SO_3). This is much more toxic than SO_2 and has much more affinity to water molecules in the atmosphere or lungs where it forms Sulfuric Acid (H_2SO_4), a highly corrosive acid. SO_2 emissions were not conducted since, according to the draft report, airports are not identified as significant sources of these emissions (I:6-64).

6. In addition, Sulfur compounds, Nitrogen Oxides, Lead, and various reactive volatile hydrocarbons can form other chemical complexes that are deleterious to all forms of life. These forms include a barrage of toxic and synthetic compounds whose effect on health ranges from clear-cut to suspicious. For example, NO_2 can combine with reactive hydrocarbons to form a wide range of pollutants including PAN, a major reactive pollutant. Some of these compounds are mutagenic and lead to cancer. Substances known to be cardiovascular irritants can directly be linked to emphysema, asthma, chronic bronchitis and heart attacks.

7. Suspended particles or particulates are tiny bits of matter (technically less than 0.1 millimeter) floating in the atmosphere, such as diesel smoke, fine ash, and dust. Particles which are smaller than 2.5 thousandths of a millimeter can pass through the primary, non-specific immune defenses such as nose hair and mucous membranes and may cause illness. Over a period of years, these materials attack lung tissue and increase susceptibility to such diseases as tuberculosis and lung cancer. And in urban areas, these particulates are believed to be responsible for increased asthma attacks, aggravating existing heart and lung conditions, lowering resistance to infection, and breathing problems in children. There is a direct correlation between high particulate air pollution and risk of premature mortality from heart and lung disease. The NRDC estimates that at current levels of pollution, approximately 64,000 premature deaths from cardiopulmonary causes may be attributable to particulate air pollution each year. That represents 6.5% of all cardiopulmonary deaths, which total 986,000 per year[9].

8. Many suspended particles serve as niche sites for microorganisms and their spores, including potential human pathogens.

9. High concentrations of suspended particles can cause reduced visibility caused by absorption and scattering of light. Soiled clothing and soot-covered buildings are other symptoms that are all too familiar.

10. Mixtures of atmospheric pollutants may show synergistic interactions, so that more aggregate damage is done by even small amounts than otherwise be expected. For example, the growth of pasture grasses is suppressed more by a mixture of SO_2 and NO_2 than by that of either alone[1].

11. Benzene, dioxin, toluene, xylene, and formaldehyde are known to be toxic and carcinogenic even at minute concentrations. None were monitored individually in the draft EIS/EIR study.

117.55

12. Overall health problems due to noise and chemical pollution include mental health problems, cardiovascular disease, gastrointestinal disease, compromised immune response, pregnancy and birth defects, learning disabilities, respiratory problems, and cancer[7].

13. Table 5.6-1 (I:5-72) indicates that the reportable concentrations of S1 and S2 soil were exceeded in some of the soil samples for arsenic, lead, and two polynuclear aromatic hydrocarbon compounds (I:5-71). Lead is known to be toxic in trace amounts. S1 soil category applies to those soils where there is a chance for a high frequency and high intensity of exposure to the soil by children and adults. While most of the lead assimilated comes from food and drink, some is inhaled. The residence time of lead in the bones is 78 years, whereas that of blood and soft tissue is about 30 days[6]. Lead emissions were not assessed by the draft report (I:6-64). 117.56

Ultimately, the lack of sufficient epidemiological and long-term health impact analysis due to these pollutants on people in affected communities is troubling.

TABLE 3 - COMPARISON OF DRAFT EIS/EIR ESTIMATES OF MAJOR AIR POLLUTANTS

Pollutant	Total 1993 Levels of Baseline Emissions for Logan (kg/day)	Predicted Low-Levels for 2010 (Alt 4/No Action)	Predicted Low-Levels for 2010 (Alt 1 - All Actions)*	% change from 1993 Levels with No Action (Alt. 4)†	% change from 1993 Levels with Action (Alt. 1)†
Carbon Monoxide	16,043	14,355	13,976	-10.5%	-12.9%
Sulfur Oxides	N/A	N/A	N/A	N/A	N/A
VOC	3,666	2,572	2,383	-29.8%	-35%
Nitrogen Oxides	5,002	7,078	6,919	+41.5%	+38.3%
Particulate Matter	241	280	251	+16.2%	+4.2%
Lead	N/A	N/A	N/A	N/A	N/A

* No data was given for the actual project (Alt. 1A)
† Negative data indicate a decrease in pollutant level while positive data indicate an increase.

- Construction Impact

1. The report claims no more than 0.6% overall impact on daily traffic due to trucking to and from the airport construction sites (I:ES-29). But the use of Routes 1A and the Ted Williams Tunnel will surely exceed that limit as hundreds of daily trucks enter and exit these roads. Furthermore, as to what roads are these trucks using to get to the aforementioned gateways, the report purports that 'certain' designated routes on state highways should be used to 'minimize' the impact on local streets (I:ES-29).

2. The draft report maintains that construction period traffic during the 2000-2004 period will generate a daily average of 129 truck round trips (range 58-580/day). The expected increase in traffic load will go on for years and will add to the already overly congested roads that lead to and from the airport. This will disrupt the normal flow of traffic on affected roads causing traffic delays, increasing traffic noise to neighboring communities as well as augmenting the existing pollution and particulate dust problem, and contributing to road erosion and structural damage. Nighttime construction will also occur. Winthrop's Office of the Board of Selectmen noted in a letter to Secretary Trudy Coxe, the Executive Officer 117.57

of Environmental Affairs, that "Past experience with other Logan construction projects has demonstrated their capacity to severely interrupt sleep patterns" (II:17.6).

• Endangered and Threatened Species of Flora and Fauna

1. The draft report mentions the loss of about 37 acres of existing grassland (I:ES-5) which is described in a later section as a net loss of 39.4 acres of "mowed grass" (I:ES-25), leaving behind 440 acres of vegetation. Of the 39.4 acres lost, 28.5 acres is due to the taxiway improvements, there is a 9% reduction in existing upland vegetation.

2. The loss of vegetation will result in loss of Upland Sandpiper (*Bartramia longicauda*) habitat due to construction of the Centerfield Taxiway between runways 4L/22R and 4R/22L. There is a mitigation plan with the Massachusetts Natural Heritage and Endangered Species Program (MNHES) to save the Upland Sandpiper. Michael Ciaranca, Natural Resource Manager of the Massachusetts National Guard stated that "... you can't simply (physically) move these birds and their nests to a different habitat."[17] Scott Melvin, from MNHES, concurred with Ciaranca that the current bird population and its nests could not be relocated but added that another site at the Massachusetts Military Reservation (Cape Cod) could serve as a new habitat that might conceptually be beneficial for the birds[21].



• Delays

1. The draft report chose 1993, a year in which flights peaked and Logan was overcrowded, as a base year for statistical comparison. In the short term (circa 1999), 29 million passengers were chosen to represent the fleet's annual passenger load. While for the long-term (circa 2010 and beyond), 2 sets were selected: 37.5 and 45 million passengers. At each passenger volume two fleet scenarios were analyzed, representing low and high-range levels of operation (III:Appendix E, p1). The benefits of Alternative Actions 1 and 1A were estimated to provide the greatest level of delay reduction with plan 1 reducing delays by between 29.3% and 60.3% (I:ES-18, and I:4-30). The draft report states that "a comparison of Peak Period Pricing (between 1 and 1A) under near-term, low fleet conditions is only 2 percent" (I:4-30). Table 4.5-2 shows that to be true. But, given the time-line for completing the runway, 1999 is not a realistic goal. Interestingly, the same table shows how the 'no build' option 3 under a high fleet scenario (with either low or high passenger loads) is much better at reducing delays than the 'build' 1A alternative (10% better for a low passenger load and 6.5% better for a high passenger load - see table 4.5-2, I:4-30). The EPA predicts a doubling of passenger capacity by 2010 at Logan (II:EPA Letter 1 dated Nov. 13, 1995), and Massport sees a 35.5% increase by 2010 (29 to 45 million passengers, III:Appendix E, p15), in which case the proposed plan will do little to alleviate congestion.

117.58

2. The Michael S. Dukakis Administration in 1989 imposed a form of peak period pricing which dropped congestion dramatically at the airport[2], thus, putting doubt on the draft report's contention that Peak Pricing is not helpful.

117.59

3. The US Department of Transportation statistics concurs with Massport's data on flight delays. But according to the FAA standards for calculating delays, Logan has only about 3% of its flights delayed[10]. The FAA sensibly does not account for delays of less than 15 minutes or those that end up in flight cancellation. But, even if short delays are excessive, the US Department of Transportation confirmed that delays are not unusual for major airports, even for state-of-the-art facilities like Denver's Centennial airport, which had 29% of its flights delayed last year[11]. 117.60

4. According to FAA data, the delay situation at Logan has improved since 1993 and is essentially in equilibrium. Massport's Aviation Planning Director, Betty Desrosiers, admitted that delays have declined in recent years as airport planners improved scheduling with airlines[10].

CONCLUSIONS

- Massport often hides behind Federal aviation rulings and ignores community pleas to provide relief from daily disturbances living next to the airport (II:9.1). Typically, the draft report gave little to no serious attention to harmful noise and pollution impacts on the people in local communities, including residential neighborhoods, schools, parks, homes for the elderly, monuments, plants, and historic and cultural land. The proposed runway would adversely affect the noise and air quality in surrounding communities and seriously prevent or hamper many redevelopment efforts currently underway. 117.61

- The widespread broadening of flights over many neighborhoods would increase noise impact to intolerable levels. Studies indicate that noise affects one's ability to concentrate and can cause sleep deprivation, resulting in potentially deleterious effects on health and well being[7]. James Maas, professor of psychology at Cornell University and author of "Power Sleep", warned that getting enough sleep is more important than diet, exercise, or any other factor in increasing people's longevity[12]. 117.62

- The draft's conclusions are drawn based on data models that fail to analyze true health impacts or to assess meaningful noise measurements. In fact, the Director of the Environment Department of the City of Boston stated that "... none of the scenarios presented can be considered to provide significant reductions in environmental impacts from airport operations. In particular, the proposed runway 14/32, touted for its unidirectional over-water approach/departure, is only marginally effective at reducing noise" (II:11.1). 117.63

- The EPA Regional Administrator stated that the region is currently in serious violation of the National Ambient Air Quality Standards for ozone, and that *any* increased traffic generated by the airport will make the Commonwealth's job of attaining the ozone standard more difficult (II:1). 117.64

- While implementation of Peak Period Pricing was initially considered, the report claimed that "no US airport imposes a peak pricing system", and that "airline over-scheduling is not a significant contributor to delay under low fleet conditions or in the current or near-term environment at Logan" (I:ES-18). But, interestingly, the same report admits in a footnote that both New York and New Jersey Port Authorities apply a 'surcharge' to general aviation aircraft operating during peak hours. Furthermore, the Dukakis administration in 1989 imposed a form of peak period pricing which dropped congestion dramatically at the airport[2]. Recently, the Conservation Law Foundation weighed in against the runway plan, arguing that Massport could do more to alleviate flight delays by creating cost disincentives for airlines to fly at peak times[24]. 117.65

- The Draft's attempt to 'divide and conquer' local communities by promising a balance in overhead flights is ill advised. In fact, the new runway and taxiway will allow the airport to grow beyond rational limits. Bennet Heart, a spokesperson from the Conservation Law Foundation, stated that "the (environmental impact statement) paints a fairly frightening projection for growth at Logan"[25]. Growth of Logan will augment existing noise and chemical pollution levels for nearby communities. Most troubling is the disproportionate, biased, and significant increase in air traffic over low-income and minority communities of East Boston, Chelsea, Everett, and Roxbury. 117.66

- The report often failed to reference the appropriate tables for the graphs shown. Given the amount of time we were allotted to provide a response, we spend precious time looking for raw data that were not referenced in the shown graphs (see bar graph ES-4: I:ES-19). 117

- It is clear from the data that there is no significant decrease in congestion or delays due to the proposed plan and that any minor decrease in delay is invalidated by the immense social cost to the neighboring communities. US Representative Michael Capuano wisely stated that "if 14/32 will not permanently reduce delays, we shouldn't build it. The detrimental impact on our neighborhoods is too great. The burden of proof is on Massport to explain why there is a need for 14/32 when it will drastically increase airplane noise in many communities and doesn't even represent a permanent solution to the problem."[16] Logan has reached its capacity. To obviate the build option, a regional solution should be adopted. It involves moving cargo traffic to regional airports, building a connector from Worcester Airport to MassPike, working to establish North/South rail link and services, and implementing Peak Period Pricing. Long term solutions should look into planning and building a regional airport with an eye on the origin-destination demand (Table 4). 117.

TABLE 4 - LOGAN'S ORIGIN-DESTINATION DEMAND BY REGION

Region	% of Logan's origin-destination
Vermont	0.4%
Maine	2.8%
New Hampshire	7.4%
Connecticut	0.3%
Rhode Island	2.4%
Massachusetts, west of 495	8.8%
Massachusetts, between Rt. 128 and I-495[2]	28.6%
Massachusetts, inside Rt. 128 excluding Boston[2]	28.6%
Massachusetts, City of Boston	20.6%
Total	99.9

[1] Adapted from I:2-8 and Executive Summary Report:ES-10.
[2] Combined 57.2% of Logan's origin and destination passenger demand is drawn from these two regions.

- Massport purports the draft report to be a full disclosure document. But, it leaves many details out and obscures the major issues that can potentially affect public health which deserves full public scrutiny under The Massachusetts Environmental Policy Act (MEPA). As the project would significantly increase Logan's airside capacity, the environmental consequences would be extraordinary. Failure to see the environmental impact of the build option will condemn hundreds of thousands of local residents to living with deteriorating medical, social, and environmental conditions. These communities have not been given fair consideration in this matter. 117.69

- Given Massport's history at keeping promises[26], its current assurance[22] that runway 14/32 will be unidirectional is dubious at best (I:ES-4). The FAA and Massport can reverse this 'flight of fancy' promise at any time following runway completion. 117.70

- In the final analysis, Massport is putting a price on our heads. The Agency is gambling away the public's health in favor of alleviating what are mostly minor delays. As the level and cost of airport pollution climbs, Massport has made no apologies and has not addressed the long-term and cumulative impact of pollutants on our health and the environment in a satisfactory manner. 117.71

Massport's argument regarding the "Airside Improvement Project" is myopic: It concentrates more on the economics of cutting airline cost and business benefits but minimizes the tremendous environmental, social, and medical costs it is imposing on its neighbors. The true cost to society, in other words, is never measured properly. We respectfully submit that any permanent and long-term impact damage visited on local communities should not be brushed aside in favor of business 'profit' or for alleviating petty delays. And that any money earmarked for Logan expansion would be better spent on alleviating current levels of noise and chemical pollution felt throughout the local communities.

REFERENCES

1. **Ashenden, T. W., and Mansfield, T.A.** 1978. Extreme pollution sensitivity of grasses where SO_2 and NO_2 are present in the atmosphere together. Nature 273:142-143.

2. **David Warsh.** How to fix the Airport. The Boston Globe, March 23, 1999, p C1.

3. **R. Odell. Ballinger.** Environmental Awakening: The New Revolution to Protect the Earth. Publishing Company, Cambridge, Massachusetts. 1980.

4. **N.J. Greenwood and J.M.B. Edwards.** Human Environments and Natural Systems. 2nd Edition. Duxbury Press, North Scituate, Massachusetts. 1979.

5. **W.B. Clapham, Jr. Human Ecosystems.** Macmillan Publishing Co., Inc. New York. 1981.

6. **Robert M. Garrels, Fred T. MacKenzie and Cynthia Hunt.** Chemical Cycles and the Global Environment: Assessing Human Influences. William Kaufmann, Inc. One First Street, Los Altos, California 94022. 1975.

7. **D. Dennis Hansen, M.D. and Lee A. Sanders M.D., Ph.D.** The Adverse Health Impacts of Airport Expansion with Particular Reference to Sea-Tac International Airport. Health Subcommittee of the Environmental Impact Committee of the Regional Coalition on Airport Affairs. 10/5/92. http://www.accessone.com/rcaa/health.htm.

8. Airport noise is harmful to the health and well-being of children and may cause lifelong problems, Cornell study shows. http://www.eltoroairport.org/issues/cornell-030498.html.

9. Air Pollution FAQ. May 1996 report by the Natural Resources Defense Council. http://mail.igc.apc.org/nrdc/faqs/aibrefaq.html.

10. **Stephanie Ebbert.** Delays at Logan Seen as Overstated. The Boston Globe. p A1, April 3, 1999.

11. **Yvonne Abraham.** Massport and Foes Dispute Delays. The Boston Globe. p B1, April 4, 1999.

12. **David L. Chandler.** Spring forward, then fall asleep Body clocks lag, specialists say. The Boston Globe, April 4, 1999, p. B1.

13. **Mark Lawrence.** An Opinion. Posted on a Delphi discussion group (accessed through www.stop1432.com).

14. **Stephanie Ebbert.** Communities Object to Airport's Plans for a New Runway. The Boston Globe. p B1, March 2, 1999.

15. **Stephanie Ebbert.** Communities Protest Logan Plan at State House. The Boston Globe. p B4, March 30, 1999.

16. **Michael Capuano**. Massport Must Rethink New Logan Runway. The Boston Globe. p A23, March 10, 1999.

17. **Michael Ciaranca**. Personal Communication. Wednesday, April 7, 1999 (around 1 p.m.). (508) 968-5121.

18. **Stephanie Ebbert**. In Runway Push Agency Cites Delays. The Boston Globe. p B4, April 7, 1999.

19. **Andy Dabilis**. New Logan Runway Debated at Hearing. The Boston Globe. p B6, April 8, 1999.

20. **Stephanie Ebbert**. State Hearings Mark Runway's Long Road. The Boston Globe. p B5, April 7, 1999.

21. **Scott Melvin**. Personal Communication. Wednesday, April 7, 1999 (around 3 p.m.). (508) 792-7270, ext. 150.

22. Comment by **Betty Desrosiers**, Massport Aviation Planning Director. Presentation to the Massachusetts Environmental Protection Agency (MEPA) and the Federal EPA holding a joint formal meeting for public comment on "Draft - Environmental Impact Report (EIR #10458) Logan Airside Improvement Plan" held at the Holiday Inn, 225 McClellan Highway, East Boston, MA. Thursday, April 8, 1999.

23. **William L. Masterton and Emil J. Slowinski**. Chemical Principles. 1977. Fourth Edition. W.B. Saunders Company, Philadelphia.

24. **Stephanie Ebbert**. Cellucci, Massport eye Worcester Airport takeover. The Boston Globe. p B6, April 16, 1999.

25. **Laura Brown**. Conservation Group Not Sold On Plan for New Runway. The Boston Herald. P. 15, April 16, 1999.

26. **Roberta Holland**. Ex-Massport Chief Confirms Promises Were Made to Residents. Boston Business Journal. March 22, 1999.



ACE
alternatives for community & environment
Law and Education for Environmental Justice

On February 11, 1994, President Clinton signed Executive Order 12898, the Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations ("Executive Order on Environmental Justice"). This precedent-setting measure for the first time in history requires all federal agencies to incorporate achieving environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations of the nation.

Following the directive of this Executive Order on Environmental Justice, the Department of Transportation ("DOT"), in concert with all other federal agencies, established its own "Department of Justice Order to Address Environmental Justice in Minority Populations and Low-Income Populations." Binding on all DOT administrations, including the Federal Aviation Administration, this Order is a key component of DOT's June 21, 1995 Environmental Justice Strategy (60 Fed. Reg. 33896).

In sum, the Executive Order on Environmental Justice, DOT's Order on Environmental Justice, and DOT's Environmental Justice Strategy require in no uncertain terms that disproportionate impacts on low-income and minority populations be avoided.

> It is the policy of DOT to promote the principles of environmental justice (as embodied in the Executive Order) through the incorporation of those principles in all DOT programs, policies, and activities. This will be done by fully considering environmental justice principles through planning and decision-making processes in the development of programs, policies, and activities, using the principles of the National Environmental Policy Act of 1969 (NEPA), Title VI of the Civil Rights Act of 1964 (Title VI), . . .and other DOT statutes, regulations and guidance that address or affect infrastructure planning and decisionmaking; social, economic, or environmental matters; public health; and public involvement.

DOT Order to Address Environmental Justice in Minority Populations and Low-Income Populations. [OST Docket No. OST-95-141 (50125)].

The Order underscores the importance of Title VI, further stating that, "[u]nder Title VI, each Federal agency is required to ensure that no person, on the ground of race, color, or national origin, is . . . denied the benefits of, or subject to discrimination under any program or activity receiving Federal financial assistance." *Id.*

DOT's position on environmental justice and fundamental fairness could not be clearer.

Historically an Italian-American population, the community most drastically impacted by Logan International Airport, East Boston, has always been a low- to moderate-income community. However, East Boston is emerging ethnically and culturally as minority populations grow. East Boston now can boast of Italian-Americans living side-by-side with Latino and South East Asian immigrants, for example.

But East Boston is not alone in receiving the impact of Runway 14/32 proposal. With stepped up use of Runway 27 as a part of the new scheme, the communities of Chelsea, Roxbury, the South End, and Jamaica Plain, among others, will receive an appreciable increase in overhead air traffic and noise on the Runway 27 path.

These are the same communities that have the highest asthma hospitalization rate in the state (Roxbury), host the most trash transfer stations, the most brownfields sites, the most diesel buses, and other noxious uses than communities anywhere else in the Greater Boston area. It appears to be no coincidence that Massport and the FAA are planning a further assault on the health and well-being of these communities. The Logan expansion is perpetuating the unfair paradigm that has plagued residents in these communities for decades.

Chelsea is a "majority minority" community with the majority of its residents now people of color. Roxbury continues to be largely populated by people of African descent, now with Haitian, Puerto Rican, Dominican, and Cape Verdean populations along with African-Americans. The South End and Jamaica Plain have similar ethnic mixes that include Latino and African-American populations and a variety of income levels including low-income. Each of these communities includes the very populations that Congress sought to protect under Title VI of the Civil Rights Act of 1964. President Clinton amplified that protection under his Executive Order on Environmental Justice, which was again heightened under the DOT Order on Environmental Justice.

The FAA, by the federal Orders, and Massport, by Title VI, are mandated to make extraordinary efforts to avoid impacts to communities of color as well as low-income communities by selecting appropriate alternatives. The FAA and Massport have failed to make even minimal efforts to avoid impacts to these protected communities. The fact that a host of protected communities in and around Boston will be disproportionately impacted by the proposed expansion is glaring and raises the specter of discrimination prohibited by Title VI of the Civil Rights Act of 1964. 117.72

This proposed expansion is squarely against the letter and spirit of civil rights and environmental justice and in violation of the federal Orders and Title VI. Therefore, the proposed expansion must be stopped.

Boston Chemical Data Corp.
P.O. Box 812392 - Wellesley, MA 02482
tel. 508-653-6588 fax. 508-653-0804

Toxic Chemical Emissions, Releases and Storage Logan Airport Impact Area

Summary of Emissions In Airport Expansion Impact Area

Boston, Somerville, Winthrop and other Logan Airport-impacted communities receive a significant burden of toxic chemicals in their air from local concerns which use hazardous chemicals. Additional chemical compounds which are hazardous to health are contributed by air and ground traffic-related sources. These include nitrogen and sulfur oxides, as well as hydrocarbon-based particulates and ozone-producing compounds. The full listing of specific sources included in the USEPA's records follows in an appendix. These records are available from the Toxic Release Inventory(TRI) and the Aerometric Information Retrieval System (AIRS).

These host communities already experience a dose of hazardous air pollutants (HAPs) which measurably, and perhaps dramatically, harms their health. By concentrating airport bound ground traffic into the expanding Logan facility, residents exposure to HAPs increases. Measures which increase this ground and air traffic, such as the expanded parking facilities and runway expansion, add to the air pollution burden.

The host communities are exposed to hazardous air pollutants from stalled tunnel traffic, cars and trucks servicing Logan, local highways and airport access routes, and the airport and aircraft themselves. Given recent reports based on USEPA data that 60 % of these air toxics are being generated by transportation sources, it seems that consideration must be given to reducing traffic in the airport impact area, rather than increasing it. Reducing flight delays does nothing to reduce these air toxics impacts. A regional approach to reducing the ground and air traffic loads is needed.

Boston residents already experience lung cancer rates 18 % greater than statewide averages, with corresponding increases of 62 % for liver, 60 % for esophageal, and 24 % for stomach cancers. Revere residents have 80 % more than expected levels of non-Hodgkins Lymphoma. Everett lung cancer rates are 33 % higher than expected. Women in Hull have 91 % higher than expected levels of lung cancer. (All data is from MADPH 1987 - 1994 figures for males, except where noted)

Impact of Air Pollutants on Health

Government estimates of toxic chemical concentrations in local air indicate that most Americans -- over 220 million people -- live in neighborhoods where the additional cancer risk from toxic chemicals in outdoor air was more than 100 times higher than the goal set by Congress a decade ago. For 11 million Americans, according to the new estimates, cancer risk from their neighborhood air is more than 1,000 times higher than Congress' goal, the Environmental Defense Fund (EDF) announced on April 20, 1999. (Source: Environmental Defense Fund report based on USEPA data. see http://www.edf.org)

The newly released government figures are based on 1990 data and represent the first-ever estimate of which toxic chemicals, in what amounts, are in local communities' air. EDF took the government figures and calculated the associated health risks for each community. The 1990-based government estimates come with official cautions about their use, and several accuracy checks showing close comparability with measurements as recent as 1997.

"The numbers show that cars, trucks, and small businesses tend to be responsible for much more of the air's toxicity than is generally recognized," said EDF attorney David Roe. Of the air cancer risk calculated by EDF for the US as a whole, 60% is from mobile sources and 26% from small-business 'area' sources, with the remaining 14% from industrial 'point' sources. "Up to now, lack of information has meant lack of attention to some of the biggest causes of toxic air," Roe said. (see: http://www.edf.org/pubs/NewsReleases/1999/Apr/d_scorecard.html)

Illustrating the point is the fact that the District of Columbia shows a higher per-capita cancer risk in its air than any of the 50 states, despite having virtually no major industrial facilities. Car and truck traffic and the Ronald Reagan (National) Airport were its main sources of air toxics.

Asthma Incidence

New England has the highest number of hospital visits due to asthma per capita, 81% higher than the national average. (IMS) In fact, 10-20% of all summertime respiratory-related hospital visits in the Northeast are associated with ozone pollution. (EPA)

Asthma is the 6th most prevalent chronic condition among adults and children. In the last 10 years the incidence of asthma has doubled, especially among minority populations living in urban areas. (ALA)

Asthma is the most common chronic disease for children. It is the leading cause of school absenteeism; one third of all missed school days are attributed to asthma. For children, asthma is the number one cause of doctor's office visits, emergency room visits, and hospital admissions(Data source: EPA, NEJM; Text source: MADEP)

Role of Motor Vehicle Traffic in Air Pollution

Traffic on the road causes about 40% of the pollutants that react with sunlight to produce ground-level ozone, the main ingredient in smog. (MADEP) Ozone irritates living tissue in lungs, eyes, nose. It burns your lungs the way the sun burns your skin. (ALA)

There are over 4.2 million cars, and about 100,000 buses and trucks,registered in Massachusetts and driving on our roads. And another 500,000 commercial vehicles pass through our state on any given day. (Source: MA DEP web site: http:// www.dep.state.ma.us.

Summation

Any credible model for pollutant reduction includes efforts such as replacing short haul air traffic and its associated ground automobile traffic with electrified high speed rail. This more efficient transportation system would have a positive effect on air pollution if it were given the same level of support from parts of the Community which have pressed for Logan runway expansion. 117.73

The communities in the Logan Airport impact area already experience higher levels of cancer and asthma specifically because of the excessive burden of transportation emissions they experience. Increasing the pace of these emissions may well add to this burden of exposure.

Submitted by Marco Kaltofen, P.E. Civil
Boston Chemical Data Corp.

Letter 117
Green Works
John T. O'Connor, President

Code	Topic 1	Topic 2	Comment	Response
117.1	Air Quality	Impacts	It is probable that construction of a new runway will in fact create new opportunities for growth in airport operations, and consequently, in aircraft and motor vehicle emissions. Viewed this way, Massport's assertion that air quality impacts from 14/32 are beneficial or negligible is just downright wrong.	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent EDRs (Annual Updates).
117.2	Air Quality	NAAQS	Massport pays scant attention to Logan's role in MA's ozone problem...the DEIS explores the issue superficially, despite its own projection that Logan growth will cause significant increases in NOx emissions in coming years.	40 CFR 93 instructs parties to address ozone by quantifying its precursors, NO_x and VOCs. This quantification was done for the EIS/EIR, comparing project-related NO_x and VOC emissions to the *de minimis* values for this non-attainment area. The project-related emissions were shown to be *de minimis*.
117.3	Air Quality	NAAQS	The DEIS fails to properly consider certain hazardous air pollutants (HAPs) like benzene and formaldehyde that are known or probable carcinogens, through its misleading use of overly-broad categories.	Although hazardous air pollutants (HAPs) are not specifically addressed, Section 6.8.7 of the Supplemental DEIS/FEIR includes a discussion of public health. Because VOCs and PM_{10} emissions are lower with the Airside Project than without it, it can be concluded that from these emissions will also be lower with the Airside Project Alternatives, when compared to the No Action Alternative.
117.4	Air Quality	NAAQS	Massport's own projections show significant increases in emissions of particulates with diameters less than 10 microns...the DEIS fails to adequately treat the special concerns associated with particulates of less than 2.5 microns.	Particulate Matter (PM) emission factors for aircraft are very limited, at best, and nonexistent in most cases. Therefore, as a conservative, worst-case assumption, the air quality analysis assumed that all PM is less than 10 microns in diameter. No emission factors or approximation methods are available for $PM_{2.5}$. The emissions inventories for future conditions and alternatives are contained in Section 6.4 of the Supplemental DEIS/FEIR and Appendix F. These inventories show that all Alternatives, including the No Action and Preferred Alternative, are well within acceptable criteria. In addition, dispersion modeling indicates no violation of the NAAQS for the pollutants analyzed (CO, NO and PM_{10}) under any alternative and future year.
117.5	Noise	Impacts	...Massport's treatment of noise as largely a nuisance factor to be dealt with only within the confines of narrowly-drawn and ill-defined contours is unacceptable.	Logan Airport has one of the most comprehensive and progressive sound insulation programs of any airport in the country. It was initiated in 1980 before any airport began receiving federal funding to soundproof homes under FAR Part 150. It is the only program in the country to offer residents extra sound insulation treatment in a "room of preference" chosen by the homeowner and it is the only program in the country attempting to receive FAA approval to expand the area of eligibility by accounting for hill effects. In addition, as of the 1999–2000 construction season, FAA grants covering 80 percent of the cost of sound insulation (paid for by airline ticket taxes), combined with funds provided by Massport through Passenger Facility Charges and landing fees, had fully funded the sound insulation of all eligible dwelling units in Massport's current sound insulation program. Despite this accomplishment, Massport continues to seek means of expanding its sound insulation program exclusive of FAA's decision on this Supplemental DEIS/FEIR. If the FAA approves the Preferred Alternative, Massport is committed to expanding the program to include all additionally eligible residences.

Code	Topic 1	Topic 2	Comment	Response
117.6	Air Quality	Model	The DEIS appears to sharply understate these motor vehicle emissions, by assuming—inexplicably—that motor vehicle traffic growth will lag well behind passenger growth; the direct opposite of what has actually proven true in recent years.	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).
117.7	Air Quality	Model	The DEIS analysis does not include aircraft emissions at altitudes of above 3,000'.	Emissions released above 3,000 feet are not expected to have any ground-level impact. Therefore, a mixing height of 3,000 feet is considered acceptable for this analysis.
117.8	Environmental Justice	Impacts	...Massport's proposal clearly flouts President Clinton's Executive Order No. 12898, making environmental justice a key criterion.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.
117.9	Public Health	Effects	...Massport should be required to thoroughly assess potential health effects associated with existing levels of Logan operations on Massachusetts residents.	Massport has provided the City of Boston and public health agencies with air quality and emissions data. In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 *Report to the Mayor, Health of Boston* prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the *Soot Deposition Study* with public health agencies and is cooperating with the Harvard School of Public Health on the *South Boston Particle Source Apportionment Study*. Information on public health issues is provided in Chapter 6 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
117.10	Regional Transportation	Regional Airports	Massport instead must be required to operate within the context of a true long-term transportation plan for our region, one that...makes maximum best use of other airports in our region like T.F. Green and Manchester....	Massport considers Logan Airport to be part of a regional system of airports that includes the T.F. Green/Providence, Worcester Regional and Manchester airports. Service developments and increased traffic at these airports are a component of the region's long-term strategy to accommodate passengers and activity growth. By its agreement to assume operational responsibility and the eventual ownership of Worcester Regional Airport, Massport is working to increase air services at Worcester Regional Airport and its role in accommodating air travel demand generated in communities west of I-95 and I-495. Greater use of the regional airports will relieve traffic growth pressures at Logan Airport, but will not eliminate the need for the Airside Project. Developments at the regional airports and their impacts on Logan Airport are described in Chapter 2 of the Supplemental DEIS/FEIR.
117.11	Regional Alternatives	Passenger Rail	...[a long-term transportation plan] shifts us away from ever-increasing reliance on air travel, and toward transportation alternatives like high-speed rail that have far lower environmental and human impacts.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.
117.12	General Opposition		...demand...A binding and legal agreement which halts any existing plans to expand Logan Airport in any way, shape or form. Including but not limited to the completion of the proposed Runway 14/32 and the centerfield taxiway.	The Airside Project will not change Logan Airport's airfield capacity of approximately 120 aircraft operations per hour. Regarding caps on airport operations, federal constitutional provisions (preemption, commerce clauses, equal protection), federal aviation statutes and regulations, and contractual provisions related to covenants in connection with the Federal Airport Improvement Program grants which Massport receives, restrict Massport's ability to control the number of aircraft operations at Logan Airport. Massport has undertaken a comprehensive mitigation program, such as Logan Airport Noise Rules, for those areas that fall within its powers as proprietor of Logan Airport, which are not preempted under federal law.
117.13	Regional Transportation	Regional Airports	...demand...a regional transportation plan that addresses New England's long-term transportation needs with less reliance on Logan.	Refer to response to Comment 117.10.

Code	Topic 1	Topic 2	Comment	Response
117.14	Environmental Review Process	Blue Ribbon Panel	...demand...An outside evaluation of Logan Airport which assesses performance and makes recommendations for improvements within the existing infrastructure.	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.
117.15	Environmental Review Process	Public Process	...demand...Establishment of a citizen's advisory board to serve as a liaison between Massport and the effected communities.	There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.

Code	Topic 1	Topic 2	Comment	Response
117.16	Environmental Review Process	Public Process	...demand...Appropriation of funds to conduct an Environmental Impact Study which includes an in-depth, long-term study of Logan Airport's impact on all surrounding cities and towns within heavily traveled flight paths.	To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study.
117.17	Environmental Review Process	Public Process	...demand...Creation of a Good Neighbor Agreement between residents and Massport that requires Massport to provide a forum for good faith negotiations.	Comment noted.
117.18	Air Quality	NAAQS	The EIS fails to address the NOx/ozone question in a meaningful manner, for example, Massport has not included emissions caps in its preferred alternative.	40 CFR 93 instructs parties to address ozone compliance by quantifying its precursors, NO_x and VOCs. This quantification was done for the EIS/EIR. Emissions caps and other potential mitigation measures have been evaluated in the *1999 ESPR*.
117.19	Air Quality	NAAQS	Hazardous Air Pollutants...The EIS fails to assess or project emissions trends for this particularly dangerous component of VOC and fine particulate emissions.	Refer to Response to Comment 117.3.
117.20	Analysis Assumptions/ Methodologies	Passenger Forecasts	...Massport data showing the relationship between passenger use and traffic volume over the past five years suggests that Massport is "low balling" the growth in traffic volume needed to accommodate its forecasts.	The proposed Airside Project will not stimulate additional growth in passenger activity levels at Logan Airport. Off-site motor vehicle emissions estimates are shown in Table 6.4-9 of the Supplemental DEIS/FEIR. Increases in the number of vehicles accessing Logan Airport are not analogous to increases in emissions. As indicated in the table, these emissions generally decrease in the future; as a result of improved motor vehicle emission standards.
117.21	Air Quality	Model	The "emissions gap" problem is heightened by the EIS's neglect of emissions outside of 1-95/128 and aircraft emissions at altitudes greater than 3000 feet.	The air quality analysis was conducted for motor vehicle traffic that can be reasonably distinguished from background traffic on the regional roadway network. Both on-site and off-site roadways are analyzed in Sections 5.3 and 6.3 of the Supplemental DEIS/FEIR. A mixing height of 3,000 feet is standard for aircraft analyses.
117.22	Air Quality	Impacts	...Massport's EIS fails to acknowledge that a new runway will act to stimulate new growth and allow for expansion and is deficient in its assessment of the environmental impacts of Logan expansion.	The Preferred Alternative will not create additional passenger demand or flight operations at Logan Airport. The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. Instead, Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations. The runway will substantially reduce delays that occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred absent the runway. Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in future passenger and aircraft activity at Logan Airport. The environmental impacts associated with these alternative forecasts have been evaluated in the Logan Airport Airside analysis and GEIRs.

Code	Topic 1	Topic 2	Comment	Response
117.23	Regional Transportation	Regional Airports	Massport and state authorities should replace the current Logan expansion plan with a regional transportation based on energy-efficient inter-city rail and improvement of the many other New England airports.	Refer to response to Comment 117.10.
117.24	Regional Transportation	Regional Airports	The state should initiate a true stakeholder involvement process to initiate the planning process for a regional transportation plan.	Since 1990, there have been several studies that have recommended regional initiatives to improve the efficiency of the region's inter-city transportation network. These studies reflect the cooperation of federal, state and local transportation agencies and stakeholders. Section 2.1 of the Supplemental DEIS/FEIR summarizes relevant regional planning studies and their conclusions. All studies have concluded that the Proposed Runway 14/32 and the other airside improvement projects at Logan Airport, along with increased use of the regional airports, including T.F. Green/Providence, Manchester and Worcester Regional airports, and high-speed rail services, are all necessary for accommodating the region's future inter-city air travel demand. Refer to discussion of the role of regional alternatives and steps Massport has taken to foster increased use of these alternatives in Chapter 2 of the Supplemental DEIS/FEIR. There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.

Code	Topic 1	Topic 2	Comment	Response
117.25	Environmental Review Process	MEPA	Massachusetts Department of Environmental Protection should ensure that EIS[EIR] fully address significant environmental problems.	Massport's mitigation measures are reinforced through compliance with M.G.L. Chapter 30A, Section 61 and through specific state and federal certificates approving projects that have mitigation. The status of the Section 61 Finding commitments are tracked and reported in the *Logan Airport 1999 ESPR* (previously GEIR).
117.26	Air Quality	Impacts	...[The EIS] fails to consider the impact that the a new runway will have on growth-related emission trends...Massport cannot back its assertion that "the overall impacts associated with the Airside Project Alternatives are beneficial or will remain imperceptible" from an air quality standpoint.	The emissions inventories for future conditions and alternatives are contained in Section 6.4 of the Supplemental DEIS/FEIR and Appendix F. These inventories show that all Alternatives, including the No Action and Preferred Alternative, are well within acceptable criteria. In addition, dispersion modeling indicates no violation of the NAAQS for the pollutants analyzed (CO, NO and PM10) under any alternative and future year.
117.27	Air Quality	Model	...the analysis does not include aircraft emissions that occur at altitudes greater than 3000 feet...does not include emissions from motor vehicles driving to and from Logan Airport that lie beyond I-95/Route 128...does not...include specific hazardous air pollutants (HAP's) and PM2.5...	A mixing height of 3,000 feet is standard for aircraft analysis. The air quality analysis was conducted for motor vehicle traffic that can be reasonably distinguished from background traffic on the regional roadway network. Both on-site and off-site roadways are analyzed in Sections 5.3 and 6.3 of the Supplemental DEIS/FEIR. Although HAPs are not specifically addressed, Section 6.8.7 of the Supplemental DEIS/FEIR includes a discussion of public health. Particulate Matter (PM) emission factors for aircraft are very limited, at best, and nonexistent in most cases. Therefore, as a conservative, worst-case assumption, the air quality analysis assumed that all PM is less than 10 microns in diameter. No emission factors or approximation methods are available for $PM_{2.5}$.
117.28	Air Quality	NAAQS	One of the most glaring deficiencies of the EIS is its failure to address the potential impact of emission trends...[it] says almost nothing about the impact of Logan emissions on ozone...makes no estimates of the impact of precursor emissions on ozone...fails to assess how the increases in NOx projected for Logan Airport will affect the state's ability to meet the new and stricter 8-hour average standard of 0.08 ppm.	Ozone analyses are conducted on a regional level and are not feasible for a single project. NO_x and VOCs, which are addressed in the Sections 5.3 and 6.3 of the Supplemental DEIS/FEIR, are lower with the project alternatives, when compared to the No Action Alternative.
117.29	Air Quality	NAAQS	...the EIS fails to address a number a critical issues associated with NOx. These are...NOx is an important precursor to acid rain...NOx emissions to the atmosphere are an important source of nitrate deposition to coastal waters...NOx emissions may also form secondary particulate matter, which can impact the respiratory system....	The assessment of NO_x included in the Supplemental DEIS/FEIR shows a reduction in emissions from the Airside Project alternatives, when compared to the No Action Alternative.
117.30	Air Quality	Impacts	The EIS fails to present evidence on the particle size distribution of particles emitted from aircraft...[It] should also consider how this particle size distribution is modified as it moves through the urban atmosphere.	The FAA acknowledges that little or no information is known about the particle size distribution from aircraft emissions. For the purpose of this analysis, it was conservatively assumed that all particulate matter is less than ten microns in diameter.
117.31	Air Quality	Impacts	The Logan EIS presents no information on hazardous air pollutants and their potential impact on cancer rates in surrounding communities.	Refer to Response to Comment 117.3.
117.32	Ground Transportation	Access to Logan	The EIS does not sufficiently address the impact of its projected expansion rates on airport traffic.	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).
117.33	Regional Transportation	Regional Airports	The EIS fails to develop a regional transportation plan as a serious alternative to a new runway and continued expansion.	Refer to response to Comment 117.10.

Code	Topic 1	Topic 2	Comment	Response
117.34	Open Space/ Parkland	Impacts	Runway 14/32 will triple the overflights and ruin the Arboretum for all our citizens.	The Supplemental DEIS/FEIR contains additional analysis of the project relative to parklands. As depicted in Figure 6.3-4 of the Supplemental DEIS/FEIR, the Arnold Arboretum, Emerald Necklace, and Franklin Park are well outside the 65 dB DNL noise contour associated with the Preferred Alternative. Therefore, the Airside Project will have no impact on these parklands. In addition, the Boston Harbor Islands, while within the No Action Alternative 65 dB DNL noise contour, will have no noise increase under the Preferred Alternative. Refer to Section 6.3 of the Supplemental DEIS/FEIR for additional discussion of parklands.
117.35	General Opposition		More runways mean more plane traffic which means more pollution and greater environmental damage.	The Preferred Alternative is a delay reduction program that promotes the efficiency and safety of airfield operations at Logan Airport. Runway14/32 enhances operating efficiency by providing a third available runway in weather conditions that require northwest-southeast operations. Similar three-runway configurations exist for all other operating directions. Runway 14/32 would not expand the overall capacity of the airport, since Logan Airport's normal operating capacity of 120 operations per hour, which is available approximately 80 percent of the year, is maintained with Runway 14/32. Massport is committed to ensuring that the airfield continues to function as efficiently as possible. The Preferred Alternative achieves this goal responsibly.
117.36	Alternatives	Preferred Alternative	Why is it that I have to pay for an HOV lane on the Southeast Expressway that I can't use, but Massport says it can't limit puddle jumpers' access to Logan? Why not an "HOV airport?"	Federal constitutional provisions, federal aviation statutes and regulations, and contractual provisions related to Federal Airport Improvement Program grants prevent Massport from any control over airline rates, routes, and schedules. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users. Major factors in airline competition are frequency of service and number of markets served, and Massport has no ability to force airlines to consolidate or eliminate flights to influence load factor or aircraft size.
117.37	General Opposition		Why does Massport calculate the value of passengers' time lost to delays, but ignore the economic costs Logan imposes every day on its neighbors?	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR documents comply with all applicable NEPA and MEPA requirements. A cost benefit analysis is not required by federal or state law and would not provide appropriate context. Cost information mentioned in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is intended to provide analytic context.
117.38	Noise	Sound Insulation	Massport sent us...a letter telling us that we did not qualify for sound proofing. Massport says our home lies four houses away from the noise contour lines which Massport presently utilizes.	Massport continues to pursue FAA approval of noise model adjustments that would permit expansion of its sound insulation program to include the effects of terrain. Massport also expects to extend eligibility lines to include boundaries that follow local streets rather than strict noise contour lines. Nevertheless, Massport continues to believe that the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, but also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the *Logan Airport 1999 ESPR.*
117.39	Air Quality	NAAQS	Because of Logan, East Boston's air quality violates the Federal Clean Air Act....	The dispersion modeling results indicate no violation of the NAAQS (NAAQS) or, analogously, the CAA because of Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
117.40	Regional Transportation	Regional Airports	Regional planning-not runway expansion-should be implemented immediately.	Regional initiatives to improve the efficiency of the region's inter-city transportation network have been studied since 1989. Section 2.1 of the Supplemental DEIS/FEIR summarizes relevant planning studies and their major conclusions. A regional transportation strategy that includes the expansion of regional airports, the development of high-speed rail, and the construction of Runway 14/32 and other infrastructure improvements at Logan Airport has evolved from these important studies. All the major improvements to the regional transportation system have been implemented except for improvements to Logan Airport's airfield. The regional airports have been experiencing tremendous growth in services and passenger traffic since 1996 and Amtrak introduced its high-speed Acela train service between Boston and New York in December 2000. Massport considers Logan Airport to be part of a regional system of airports that includes the T.F. Green/Providence, Manchester and Worcester Regional airports. Service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate growth in air travel demand. While greater use of the regional airports and high-speed rail will provide relief to Logan Airport, the proposed Airside Project provides clear benefits at current, as well as future, traffic levels. The benefits will only increase in the future, even as regional transportation developments act to reduce the rate of future growth at Logan Airport.
117.41	Noise	Impacts	What is Massport's plan to help abutters live with the present noise and contamination?	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* and its updates. Chapter 8 of the Supplemental DEIS/FEIR summarizes Massport's proposed project-specific mitigation program associated with the Preferred Alternative including: Runway 14/32 would be designed, constructed, and operated to handle over-water operations only. Massport would seek to construct Runway 14/32 to reflect unidirectional use. To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, and also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the *Logan Airport 1999 ESPR*. For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements. During the construction period an extensive array of traffic, air quality and noise mitigation measures will be employed to mitigate temporary construction impacts. A PRAS monitoring system to gather data and report on the actual achievement of PRAS. The objective of this system is to improve the FAA's achievement of the community's PRAS goals and to provide a broader platform for disclosure of the monitoring results. While not related to Airside Project impacts, Massport will commit to discussions with the FAA with the goal of instituting local or national restrictions on the use of hushkitted Stage 3 aircraft at Logan Airport. Massport reports the status of those consultations in the *1999 ESPR* and subsequent EDR. Massport is actively involved in many air quality initiatives and explored other options to reduce emissions from activities at Logan Airport in the *1999 ESPR*

Code	Topic 1	Topic 2	Comment	Response
117.42	Air Quality	Impacts	I'm also concerned about the air pollution from the planes overhead. Is anyone thinking about the effects of that?	Aircraft emissions are evaluated to 3,000 feet. Beyond this height, emitted gases and particles are not expected to have substantial ground-level effects.
117.43	General Opposition		Sixty thousand jets over the South End are going to cause air pollution and if they want to fly any lower, there'll be no quality of life.	Emissions are shown to decrease with the Preferred Alternati when compared to the No Action Alternative. Implementation of Runway 14/32 would not result in substanti noise impacts in any community. Rather, it would enable the a traffic controllers to adhere more closely to the PRAS goals ar decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.
117.44	Air Quality	Impacts	Eight years ago when I moved into my house in Winthrop, I could hear the airport, but now with the increase in air travel I can also smell the jet fuel, and tires burning from the landings.	The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative. Massport is actively involved in many air quality initiatives and explored other options to reduce emissions from activities at Logan Airport in the *Logan Airport 1999 ESPR* (previously GEIR).
117.45	General Opposition		...a family who grew up in the same house near the airport, at least three of us have gotten asthma.	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop.A review of the available information did not indicate any causal relationship based on proximity to the airport. The 1999 Massachusetts budget included $150,000 to fund an environmental assessment of the health impacts of Logan Airport on any community located within a five-mile radius of th airport. The final protocol for the study is being developed. The study is expected to be completed in summer 2002.
117.46	Noise	Impacts	The FAA's threshold of 65 decibels does not accurately assess how many people are disturbed by aircraft noise.	A noise exposure of 55 to 65 dB DNL is believed to be generally compatible with residential land use, although the expected percentage of the population to be highly annoyed ranges from four percent at the 55 dB end of the range to 15 percent at the 65 dB end. Exposure to 65 to 75 dB DNL is considered marginally compatible with residential land use with residential structures that have a 25 to 30 dB noise level reduction. In this higher noise exposure range, the expected percentage of the population to be highly annoyed varies from 15 percent at 65 dB to 37 percent at 75 dB.
117.47	Noise	Mitigation	No remedy was given [in the Draft EIS/EIR] for the structural damage due to low-flying aircraft vibrating homes, school buildings, monuments, and industrial infrastructures within the affected communities.	Neither Massport nor the FAA is aware of any evidence to support the contention that structural damage has ever occurred due to overflights. Noise-induced vibration levels from aircraft, though they may cause rattling, are normally less than footfalls produced by people walking through their own homes.

Code	Topic 1	Topic 2	Comment	Response
117.48	Environmental Justice	Impacts	...if the plan is implemented, there will be a disproportionate and exorbitant increase in flights over poorer communities such as sections of Chelsea, East Boston, Everett, and Roxbury.	Refer to Section 6.8 of the Supplemental DEIS/FEIR for a discussion of the Environmental Justice analysis. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.
117.49	Open Space/ Parkland	Impacts	The Harbor Islands recreational area will suffer significant noise impact.	The Boston Harbor Islands, while within the No Action Alternative (Alternative 4) 65 dB Day-Night Sound Level (dB DNL) contour, will have no noise increase with the Preferred Alternative. Refer to Section 6.3.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative.
117.50	Analysis Assumptions/ Methodologies	Base Year	...emission predictor uses 1993 as a contrast item...the predicted emission reductions for year 2010 are undoubtedly minimized to favor a lesser environmental impact.	The Supplemental DEIS/FEIR includes updated operational and environmental analyses of 1998 conditions similar to that contained in the *1998 Annual Update* prepared in October 1999. While the *1999 ESPR* published in December 2000 includes updated analyses for 1999, the differences between the two study years are small. Between 1998 and 1999, operations declined by 2.5 percent, primarily due to a decline in regional carrier operations. Since the fleet mix and runway use varied little, the shape of the noise contours and the population impacts were also similar, with slightly less impact in Winthrop and Boston and slightly more impact in Chelsea and Revere in 1999 compared to 1998. The air quality and other environmental analyses also yielded similar results. Since the relevant comparison for evaluating the proposed airside improvements is the comparison between the No Action and Preferred Alternatives, and since 1998 and 1999 are similar in terms of passengers, operations, and environmental impacts, this Supplemental DEIS/FEIR maintains the 1998 modeling analysis as a representation of recent conditions at Logan Airport.
117.51	Air Quality	Model	...the proposed action model predictor uses alternative 1 to attain this analytical profile...Since plan 1 was rejected in favor of plan 1A, these data do not necessarily fit the report's final conclusions....	The air quality assessment was conducted for the No Action Alternative (Alternative 4) and Alternative 1 (the Preferred Alternative with PPP) because the full range of potential air quality effects is bracketed by Alternatives 1 and 4. Alternative 1 results in the same air quality conditions as the Preferred Alternative (Alternative 1A).
117.52	Air Quality	Impacts	The additional combustion of gasoline and oil will increase the total Volatile Organic Compounds or Hydrocarbons (VOCs) in the atmosphere.	Although VOC emissions increase over time because of increased aircraft operations activity at Logan Airport, emissions are lower with Alternatives 1 and the Preferred Alternative, when compared to the No Action Alternative. The decreases are attributable to both the proposed Runway 14/32 and the taxiway improvements.
117.53	Air Quality	Impacts	The projected increase in passenger volume to 45 million by 2010 will have an adverse effect on the local transportation and air quality by increasing the overall level of ozone in the airport region and on roads leading to the airport.	Although ozone dispersion modeling is not possible for the Airside Project (because ozone, which is not directly emitted but formed through reactions, modeling must be done on a regional basis), emissions and dispersion of ozone precursors were calculated. The NO_x and VOC emissions from the Airside Project have been compared to the federally set *de minimis* levels for an ozone non-attainment area. Project-related emissions, which include local transportation emissions, have been found to be *de minimis*.

Code	Topic 1	Topic 2	Comment	Response
117.54	Air Quality	Impacts	Local airport traffic will also add to the problem of Carbon Monoxide (CO) emission.	The Airside Project does not result in additional aircraft operation or passenger demand for ground access services, since the project will not induce additional passenger demand. Refer to the *Logan Airport1994/95 GEIR* which includes Massport's Ground Access Management Plan and forecasted Vehicle Miles Traveled for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis.
117.55	Air Quality	NAAQS	Benzene, dioxin, toluene, xylene, and formaldehyde are known to be toxic and carcinogenic even at minute concentrations. None were monitored individually in the draft EIS/EIR study.	Toxic or hazardous air pollutants are discussed in Section 6.4 of the Supplemental DEIS/FEIR.
117.56	Air Quality	Impacts	Lead emissions were not assessed by the draft report...the lack of sufficient epidemiological and long-term health impact analysis due to these pollutants on people in affected communities is troubling.	Lead, in general, is not associated with airport emissions. The phasing out of leaded gasoline in motor vehicles means that this compound is no longer a problem in most of the United States. Issues related to health are discussed in Section 6.8 of the Supplemental DEIS/FEIR.
117.57	Ground Transportation	Impacts	The expected increase in traffic load will go on for years and will add to the already overly congested roads that lead to and from the airport.	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).
117.58	Analysis Assumptions/ Methodologies	Base Year	The draft report chose 1993, a year in which flights peaked and Logan was overcrowded, as a base year for statistical comparison.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.
117.59	Alternatives	Peak Period Pricing	The Michael S. Dukakis Administration in 1989 imposed a form of peak period pricing which dropped congestion dramatically at the airport, thus, putting doubt on the draft report's contention that Peak Pricing is not helpful.	The impacts of the Program for Airfield Capacity Efficiency (PACE) are described and evaluated in Section 3.5.1 of the Supplemental DEIS/FEIR.
117.60	Purpose and Need	Delay	...even if short delays are excessive, the US Department of Transportation confirmed that delays are not unusual for major airports, even for state-of-the-art facilities like Denver's Centennial airport, which had 29% of its flights delayed last year. According to FAA data, the delay situation at Logan has improved since 1993 and is essentially in equilibrium.	Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project is designed to reduce delays at Logan Airport from adverse winds and taxiway congestion by addressing constraints at Logan Airport. Delays caused by conditions at other airports or other factors, such as mechanical failure, are not addressed since Massport cannot influence these delays. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports. FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. Arrival delays which would be directly affected by Runway 14/32 have risen steadily since 1994.

Code	Topic 1	Topic 2	Comment	Response
117.61	Noise, Air Quality	Impacts	The proposed runway would adversely affect the noise and air quality in surrounding communities and seriously prevent or hamper many redevelopment efforts currently underway.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR. No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.
117.62	Noise	Impacts	The widespread broadening of flights over many neighborhoods would increase noise impact to intolerable levels.	There is no change in the flight paths over most of the neighborhoods. The only changes in flight paths are associated with new Runway 14/32 and these changes occur primarily over water, not over neighborhoods.
117.63	Noise	Impacts	The draft's conclusions are drawn based on data models that fail to analyze true health impacts or to assess meaningful noise measurements.	The models used for the air quality analyses (emissions inventory and dispersion modeling) are EPA- , DEP-, and FAA-approved. The dispersion modeling allows impacts to be compared to the NAAQS (NAAQS), which are designed to protect human health and welfare, including sensitive groups. There were no violations of the NAAQS for any alternative. Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the *Logan Airport 1996 Annual Update).* In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft – a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 5 of the *Logan Airport 1998 Annual Update*). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. Using results from a special study of Terrain Modeling analysis ("hill effects") in Orient Heights and Jeffries Point, Massport applied for and received approval to apply a correction to 1999 contours to account for increased levels in Orient Heights.
117.64	Air Quality	NAAQS	The EPA Regional Administrator stated that the region is currently in serious violation of the National Ambient Air Quality Standards for ozone, and that any increased traffic generated by the airport will make the Commonwealth's job of attaining the ozone standard more difficult....	DEP recently submitted a demonstration of an ozone (one-hour average) attainment plan to the U.S. EPA. This plan includes current Logan Airport-related emissions and all other emissions in Massachusetts. It is expected that DEP will be able to continue to include airport-related emissions, which show Massport's emission reduction measures, in the ozone attainment plan.

Code	Topic 1	Topic 2	Comment	Response
117.65	Alternatives	Peak Period Pricing	Peak Period Pricing [should be] considered.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. See Section 4.5.4 of the Supplemental DEIS/FEIR.
117.66	Environmental Justice	Impacts	Most troubling is the disproportionate, biased, and significant increase in air traffic over low-income and minority communities of East Boston, Chelsea, Everett, and Roxbury.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.
117.67	Noise	Studies	The report often failed to reference the appropriate tables for the graphs shown.	Refer to the new graphics in Chapters 4, 5 and 6 of the Supplemental DEIS/FEIR.
117.68	Regional Transportation	Regional Airports	To obviate the build option, a regional solution should be adopted.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
117.69	Public Health	Effects	Failure to see the environmental impact of the build option will condemn hundreds of thousand of local residents to living with deteriorating medical, social, and environmental conditions.	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport. The 1999 Massachusetts budget included $150,000 to fund an environmental assessment of the health impacts of Logan Airport on any community located within a five-mile radius of the airport. The final protocol for the study is being developed. The study is expected to be completed in summer 2002. Emissions are shown to decrease with the Preferred Alternative when compared to the No Action Alternative.
117.70	Alternatives	Runway 14/32	Given Massport's history at keeping promises, it current assurance that runway 14/32 will be unidirectional is dubious at best....	The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (*i.e.*, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32. The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.
117.71	Public Health	Effects	...Massport...has not addressed the long-term and cumulative impact of pollutants on our health and the environment in a satisfactory manner.	Refer to response to Comment 117.9.
117.72	Environmental Justice	Impacts	The FAA and Massport have failed to make even minimal efforts to avoid impacts to these protected communities.	Refer to response to Comment 117.66.

Code	Topic 1	Topic 2	Comment	Response
117.73	Regional Transportation	Regional Airports	A regional approach to reducing the ground and air traffic loads is needed...Any credible model for pollutant reduction includes efforts such as replacing short haul air traffic and its associated ground automobile traffic with electrified high speed rail.	Massport has actively encouraged regional transportation alternatives to Logan Airport, including rail. Massport supports intercity rail planning through its membership in the Boston Metropolitan Planning Organization (MPO). The MPO is a cooperative planning board whose membership also includes MassHighway, Metropolitan Area Planning Council; MBTA, and MBTA Advisory Board. As members of the MPO, Massport and these agencies are responsible for preparing the *Boston Transportation Improvement Program (TIP)* and the *Transportation Plan for the Boston Region.* In this capacity, Massport influences regional transportation plans for intercity rail. Massport also holds a seat on the Citizens Advisory Committee (CAC) of the MBTA's North-South Rail Link Project. The CAC met monthly and provided a forum for Massport and the MBTA to coordinate their ridership estimates and assessments of the relationship of the North-South Rail Link on airport access and airport usage. To date, the North-South Rail Link Project has not received funding and will not impact Logan Airport over the study time frame. Should the North-South Rail Link be constructed, resulting passenger diversions from Logan Airport to rail could reach 46,700 annual passengers, or less than one-half of one percent of Logan Airport's total annual traffic.

Thomas A Kershaw Remarks

April 7, 1999: 6:00 pm
State Transportation Building : Conference Room 5 & 6

LETTER 118

Hampshire House restaurant calls for action on Logan Airport unidirectional runway 14/32

118.1

- The proposed Logan Airport runway 14/32 is critical to the health of Boston's future convention and business travel - and restaurants that depend on the visitor industry -and I urge state and federal officials to move forward on approval of this project.

- **If we do not act on this now we will be making a multi-*billion* dollar mistake on Boston's future**

- Our competitive position as a leading visitor destination is *directly* tied to the ability of Logan Airport to handle the region's air service needs. The new 14/32 runway will be critical in reducing delays and making Logan Airport more efficient

- **The success of the new $700 million convention center, that will open in the Seaport District in late 2003, depends on the efficiency of Logan Airport.**

- If the delay problem is not addressed, it will cripple our efforts to attract and retain conventions, meetings and business travelers to Boston. At the very time when the new convention center will open delays at Logan International Airport will have grown to the point that will be unacceptable to meeting planners. As the new center reaches peak efficiency - attracting more than 300,000 visitors a year - Logan will become a national disgrace- with delays up to 54 minutes per flight!

- I support the development of a comprehensive regional airport system and the growth of Providence, Manchester and Portland Airports--as well as the high-speed rail system from New York to Boston that debuts later this year. 118.2 118.3

- Nevertheless- Logan remains the hub of the region's transportation system for business travelers and for the convention and meetings market and the success-or failure of the industry and restaurants like Hampshire House depend on an efficient Logan Airport.

Letter 118
Thomas A. Kershaw
Hampshire House

Code	Topic 1	Topic 2	Comment	Response
118.1	Purpose and Need	Delay	The proposed Logan Airport runway 14/32 is critical to the health of Boston's future convention and business travel — and restaurants...Our competitive position as a leading visitor destination is directly tied to the ability of Logan Airport to handle the region's air service needs.	Comment noted.
118.2	Regional Transportation	Regional Airports	I support the development of a comprehensive regional airport system and the growth of Providence, Manchester and Portland Airports....	Comment noted.
118.3	Regional Transportation	Passenger Rail	...[I support the] the high-speed rail system from New York to Boston that debuts later this year.	Comment noted.

LOCAL 4
INTERNATIONAL UNION OF OPERATING ENGINEERS
AFL-CIO

120 Mount Hope Street
Roslindale, Massachusetts 02131
Area Code (617) 323-9300
FAXphone (617) 323-7821

William P. Ryan, Business Manager

LETTER 119

April 22, 1999

Mr. Arthur Pugsley - EOEA No. 10458
M E P A Office
100 Cambridge Street, 20th Floor
Boston, MA 02205

Attention: Secretary of Environmental Affairs

Dear Mr. Pugsley:

The International Union of Operating Engineers, Local 4, is writing today in support of the Massachusetts Port Authority's Airside Improvement plan for Logan International Airport. Local 4 firmly believes this project is necessary to reduce delays, improve the quality of life of our memgbers and provide much needed employment opportunities. 119.1

Delays at Logan are consistently among the worst in the United States. These delays are not only inconvenient, they are costly. In 1998 delays at Logan cost airlines and their passengers nearly $310 million. These losses ultimately affect the livelihood of many working men and women as it impedes the ability of Boston and the region to compete in a global economy.

A major component of the Airside Improvement Project, Runway 14/32, provides significant noise relief our members living in the highest impacted noise areas of East Boston's Bayswater, Revere's Beachmont and Winthrop's Court Road and Point Shirley as well as South Boston's Castle Island area. The new unidirectional Runway shifts 75,000 flights over water rather than over communities. It also allows noise impacts to be spread more equitably across communities. The proposed centerfield taxiway and other improvements would further enhance air quality by reducing aircraft idling and queuing on the airfield and reduce ground noise from taxing aircraft to adjacent neighborhoods. 119.2

With an annual economic impact of $5 billion, Logan International Airport is directly responsible for creating more than 15,000 jobs in this area, many of which are the hard working men and women of the International Union of Operating Engineers.

It is therefore, without reservation, that Local 4 wholeheartedly supports Airside Improvements at Logan Airport and eagerly looks forward to the projects approval.

Thank you for your attention to this matter

Sincerely yours,

William P. Ryan,
Business Manager

Letter 119
International Union of Operating Engineers – Local 4
William P. Ryan, Business Manager

Code	Topic 1	Topic 2	Comment	Response
119.1	General Support		Local 4 firmly believes this project is necessary to reduce delays, improve the quality of life of our members and provide much needed employment opportunities.	Comment noted.
119.2	Noise	Runway Use	...Runway 14/32, provides significant noise relief for our members living in the highest impacted noise areas of East Boston's Bayswater, Revere's Beachmont and Winthrop's Court Road and Point Shirley as well as South Boston's Castle Island area.	Comment noted.

Iron Workers District Council of New England

International Association of Bridge, Structural
& Ornamental Iron Workers

JOSEPH M. QUILTY, PRESIDENT

444 Washington Street • Suite 301 • Woburn, MA 01801
Tel: (781) 937-8070 • (781) 937-8067 • Fax (781) 937-8370

LOCAL No. 7
Boston, MA

LOCAL No. 37
Providence, R.I.

LOCAL No. 57
Worcester, MA

LOCAL No. 357
Springfield, MA

LOCAL No. 474
Manchester, N.H.

LOCAL No. 496
Portland, Maine

LOCAL No. 501
Boston, MA

LOCAL No. 523
Pawtucket, R.I.

LOCAL No. 745
Portsmouth, NH

LOCAL No. 807
Winslow, Maine

LETTER 120

April 22, 1999

Mr. John C. Silva
Manager, Environmenta Programs
Airports Division
New England Region
12 New England Executive Park
Burlington, MA 01803

Dear Mr. Silva:

I am writing today on behalf of the International Association of Bridge, Structural, Ornamental and Reinforced Iron Workers to voice our strong support for the Massachusetts Port Authority's Airside Improvement plan for Logan International Airport. The Iron Workers District Council firmly believe this project is necessary to reduce delays, improve the quality of life of our members and provide much needed employment opportunities. 120.1

I personally have had many problems getting into Logan. In my last six (6) flights into Logan Airport, my plane was put into a holding pattern just flying around waiting for a runway to open. On a trip from Denver, we were in a holding pattern so long that we started to run out of fuel and had to go to Rhode Island to refuel.

This is not the way a big City like Boston can encourage people to visit our fair city if they are continuously held up by delays, etc.

Logan Airport is constantly building and expanding. Those who have built hotels, etc., depend on the growth of this airport. They can neither grow or expand if traffic is re-routed to another airport.

Mayor Menino worked hard trying to get the National Democratic Convention. If he was successful, how would we have handled the many people coming from all over the Country. Would we send them to Manchester, N.H. or Providence, R.I. and tell them to drive from there?

I know that many of the residents in the town surrounding the airport are concerned and are opposed to a third runway. However, people in those towns still buy homes and open businesses knowing fully well that the airport is there.

The new unidirectional Runway shifts 75,000 flights over water rather than over communities. It also allows noise impacts to be spread more equitably across communities, in accordance with community noise goals. The proposed centerfield taxiway and other taxiway improvements would further enhance air quality by reducing aircraft idling and queuing on the airfield and reduce ground noise from taxing aircraft too close in neighborhoods. 120.2 120.3

Logan International Airport is directly responsible for creating more than 15,000 jobs in this area, many of which are the hard working men and women of the Iron Workers Union.

It is therefore, without reservation, that the Iron Workers District Council wholeheartedly support's Airside Improvements at Logan Airport and eagerly looks forward to the projects approval.

With best wishes, I remain

Sincerely,

Joseph M. Quilty
President

JMQ/gf

Letter 120
Iron Workers District Council of New England
Joseph M. Quilty, President

Code	Topic 1	Topic 2	Comment	Response
120.1	General Support		The Iron Workers District Council firmly believe this project is necessary to reduce delay, improve the quality of life of our members and provide much needed employment opportunities.	Comment noted.
120.2	Noise	Runway 14/32	The new unidirectional Runway shifts 75,000 flights over water rather than over communities. It also allows noise impacts to be spread more equitably across communities, in accordance with community noise goals.	Comment noted.
120.3	Air Quality	Taxiway Improvements	The proposed centerfield taxiway and other taxiway improvements would further enhance air quality by reducing aircraft idling and queuing on the airfield and reduce ground noise from taxing aircraft too close in neighborhoods.	Comment noted.

Neighborhood Association
C/o Ms. Karen M. Maddalena
4 Lamson Street
East Boston MA 02128

LETTER 121

April 21, 1999

'Executive Office of Environmental Affairs
ATTENTION MEPA OFFICE
Mr. Arthur Pugsley #10458
100 Cambridge Street, Room 2000
Boston, MA 02202

Dear Mr. Pugsley:

On Monday, February 8, 1999, the Jeffries Point Neighborhood had its monthly meeting. Peter Blute, Executive Director of Massport and his staff were present at this meeting. They gave a presentation on the proposed New Runway and Taxiway 14/32. After the presentation an open dialogue took place between Mr. Blute, his staff, and the participants.

A motion was made to oppose the construction of the New Runway and Taxiway 14/32 a vote was taken, (there was 150 people present) the vote was unanimous.

The Jeffries Point Neighborhood Association has united with other neighborhoods and other communities in strong opposition to the new runway/taxiway proposal being made by Massport. Representatives from the JPNA and citizens have been actively meeting with our state and federal government legislators to discuss our concerns regarding this specific proposal, as well as the core problem of dealing with the projections for significant increases in air traffic demand for the region.

Massport has pitched the Runway 14/32 proposal as providing some relief to some areas of East Boston and distributing the impact all over East Boston Winthrop at the expense of Boston and other communities Even if true, and we have serious doubts, it would only be short-term relief. We are concerned about the entire Boston area as well as the surrounding communities. Regardless of a new runway, and according to Massport's own projections, demand for passengers and aircraft to come to the area is expected to grow significantly, and flight delays are expected to soar. As a physically small inner-city airport, Logan has exceeded reasonable capacity and cannot handle the dramatic projected demand without putting Boston, the Harbor and surrounding communities in extreme danger!

Please know that we support economic growth for Boston, the Commonwealth and New England. We are working closely Mayor Thomas Menino, City Councilors P. Scapacchio, P Mullen, F. Roche, S. Murphy, Senator Travaglini, Congressman Markey, Congressman Capuano and others in support of potential solutions to the regional air transportation problem. such as secondary airports, etc. There are answers to the problem, which could bring economic benefit outside of Boston, but trying to increase capacity at Logan is not the answer. Such a course would be severely detrimental to those of us who call the Boston area home and, ironically, to those visitors expected to fly here as well. Our health and safety are already at great risk. Our burden has increased each year. We cannot accept more!

Listed below are the some of reasons we think that Massport's draft environmental impact study (EIS/EIR0 is flawed:

- Massport's draft environmental impact study (EIS/EIR) did not rigorously explore all reasonable alternatives. 121.1
- Massport supported its conclusions with outdated studies and figures.
- There can be not guarantee of "unidirectional use" of Runway 14/32. This is an FAA decision and the FAA is making no such guarantee 121.2
- FAA modeling was not used. FAA data shows delay reduction since 1993. Massport's delay figures are inflated. 121.3
- **Affected communities were not given fair consideration we will bet 23,000 more flights over our heads annually. Soundproofing cannot mitigate the impact of this increase in noise and air pollution.** 121.4
- 121.5

Huge issues such as air pollution and respiratory health, unequal impacts, secondary ground traffic and others are ignored or glossed over, enough so that in truth, on might well ask if there is anything good to be said about it. Y 121.6

Sir, we need your attention to this issue. We ask that you listen to our concerns and protect the Quality of Life in our Community hear our concerns regarding our health and the environmental impact of this proposal. There are serious questions regarding the adequacy, quality and reliability of information supplied by Massport. Additional

understand that the quality of life of Boston area residents is threatened. We need your help!

Respectfully,

Karen M. Maddalena
Chairperson

Letter 121
Jeffries Point Neighborhood Association
Karen M. Maddalena, Chairperson

Code	Topic 1	Topic 2	Comment	Response
121.1	General Opposition		A motion was made to oppose the construction of the New Runway and Taxiway 14/32 a vote was taken, (there was 150 people present) the vote was unanimous.	The goals of the Airside Project are to reduce delay, increase the airport's efficiency, and improve airfield safety in an environmentally responsible manner. Unidirectional Runway 14/32 would also give the controllers considerably more flexibility and allow them to improve achievement of PRAS goals, and redirect many flights to overwater routes. During very high demand periods, the controllers currently have little or no flexibility for runway selection. The addition of Runway 14/32 would be the single most important mechanism to achieve equitable geographic distribution of aircraft operations. Massport and the FAA are committed to the PRAS system and have been making improvements since 1982.
121.2	Environmental Review process	MEPA	Massport's draft environmental impact study (EIS/EIR) did not rigorously explore all reasonable alternatives.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's *Logan Capacity Enhancement Plan* (October 1992); the *Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study* (December 1993); the *Logan Final GEIR* (July 1993); and the *Logan Airside Improvements Feasibility Study, Phase 1 Report*, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its *Boston Logan International Airport Capacity Enhancement Plan*. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the *Logan Airside Feasibility Study*, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.
121.3	Analysis Assumptions/ Methodologies	Base Year	Massport supported its conclusions with outdated studies and figures.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
121.4	Alternatives	Runway 14/32	There can be no guarantee of "unidirectional use" of Runway 14/32. This is an FAA decision and the FAA is making no such guarantee.	The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (*i.e.*, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32. The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.
121.5	Delay	Model	FAA modeling was not used. FAA data shows delay reduction since 1993. Massport's delay figures are inflated.	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. It includes a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport. The FAA Technical Center was responsible for the capacity and delay results in the 1992 FAA Capacity Enhancement Report for Logan Airport that concluded the need for Runway 14/32, reduced minimums and taxiway improvements. The Technical Center simulated Logan Airport airfield operations with the RDSIM model and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Airside Project Draft EIS/EIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates in 1992 with those of the Logan Airside Project estimates. The FAA has concluded that the Airside delays represent "a plausible and conservative estimate...." The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States Logan Airport's estimated annual delay hours are over five times the FAA's 20,000-hour threshold for a severely delayed airport.

Code	Topic 1	Topic 2	Comment	Response
121.6	Noise	Sound Insulation	Soundproofing cannot mitigate the impact of this increase in noise and air pollution.	While sound insulation does not mitigate exterior sound levels, it is a widely accepted measure considered appropriate for general mitigation of noise impacts. Sound insulation reduces noise inside the home. While the implementation of the Preferred Alternative would bring additional homes within the criteria for inclusion in the sound insulation program, the inside of these homes will have lower noise levels than they would have had without sound insulation under the No Action Alternative. The emissions inventories for future conditions and alternatives are contained in Section 6.4 of the Supplemental DEIS/FEIR and Appendix F. These inventories show that all Alternatives, including the No Action and Preferred Alternative, are well within acceptable criteria. In addition, dispersion modeling indicates no violation of the NAAQS for the pollutants analyzed (CO, NO and PM_{10}) under any alternative and future year.
121.7	Public Health	Effects	Huge issues such as air pollution and respiratory health, unequal impacts, secondary ground traffic and others are ignored or glossed over, enough so that in truth, one might well ask if there is anything good to be said about it.	Noise was identified as the only off-airport impact from the Preferred Alternative (refer to Section 6.2 of the Supplemental DEIS/FEIR for a discussion on noise impacts). Because of improved airfield efficiency and shorter delay periods, the Preferred Alternative is projected to slightly reduce air emissions when compared to the No Action Alternative. The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8.7 of the Supplemental DEIS/FEIR. A review of the available information did not indicate any causal relationship based on proximity to the airport. Construction will be managed to minimize air, noise and other impacts to the adjacent communities. All construction vehicles will be required to use designated truck routes and avoid local streets.

LETTER 122

Jeffries Point Neighborhood Association
C/o Ms. Karen M. Maddalena
4 Lamson Street
East Boston, MA 02128

April 21, 1999

Executive Office of Environmental Affairs
ATTENTION MEPA OFFICE
Mr. Arthur Pugsley #10458
100 Cambridge Street, Room 2000
Boston, MA 02202

Dear Mr. Pugsley:

Enclosed in this package are petitions and letters from the Jeffries Point community and impacted communities. The people who signed these petitions and letters are concerned about the expansion of Logan Airport and the environmental issues caused by this expansion..

Listed below are the some of reasons we think that Massport's draft environmental impact study (EIS/EIR0 is flawed: 122.1

- Massport's draft environmental impact study (EIS/EIR) did not rigorously explore all reasonable alternatives. 122.2
- Massport supported its conclusions with outdated studies and figures. 122.3
- There can be not guarantee of "unidirectional use" of Runway 14/32. This is an FAA decision and the FAA is making no such guarantee
- FAA modeling was not used. FAA data shows delay reduction since 1993. Massport's delay figures are inflated. 122.4
- **Affected communities were not given fair consideration we will bet 23,000 more flights over our heads annually. Soundproofing cannot mitigate the impact of this increase in noise and air pollution.** 122.5
-

Huge issues such as air pollution and respiratory health, unequal impacts, secondary ground traffic and others are ignored or glossed over, enough so that in truth, on might well ask if there is anything good to be said about it. 122.6

Sir, we need your attention to this issue. We ask that you listen to our concerns and protect the **Quality of Life in our Community**, hear our concerns regarding our health and the environmental impact of this proposal. There are serious questions regarding the adequacy, quality and reliability of information supplied by Massport. Additional health/environmental studies are needed to access the damage already caused by Logan Airport. We ask you to understand that the quality of life of Boston area residents is threatened. We need your help!

Respectfully,

Karen M. Maddalena
Chairperson

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
Phyllis Mann	252 Bremen St	East Boston Mass
Mary Albano	118 Webster St	East Boston Mass
Anna Rizzo	78 Havre St	East Boston
Marie Mckeon	78 Havre St	East Boston Mass
Lemetilde Mié - Lourdes Mendez - Petronila Rodrigue		
168 Chelsea ave #2 Chelsea Ma. (02150)		
Mary F Ponzo	24 Lamson St	E. B. Mass
Ann Lynch	30 Webster St	East Boston
Clotilde Keegan	8 Trajacobera Rd	E Boston
Angelina Sullivan	4 Marginal St.	E.B.
Joe Cocco	284 Sumner St	E B
Victor Salvo	124 Chestnut	Chelsea
Mary Rocco	124 Chestnut	Chelsea
Edna Allen	154 Bennington St	Chelsea
Frances Impot	176 Bremen St	
Lena Rizzo	757 Saratoga St	E B
Rosemarie Roberts	131 Webster St	E B

10/26

Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
Mrs (Domenic) Carmela D'Amore	62 Haynes St 02128 E. Boston Mass
Tony Scarpetta	363 Maverick St E. Bo
A — V. D'A —	3801D landing way
William Rachford	73 Howard Ford Way
Josie Costa	133 Cottage St E B.
Nella Guarino	54 Orleans St E. B.
Rose Catena	54 Orleans St. E B Mass
Millie Quintilian	52 Jaywood Ave E B
Theresa Le Rossa	481 Sumner St. E.B
Madeline Tino	290 Marginal St E.B.
Ellen T Mc Colgan	50 South Bremen St E B
Eva Bruno	54 Orleans St E B Mass
Angelina Scarpetta	363 Maverick St E. B. Mass,
Barbara Lydia	56 Lagrange St E. B. Mass
Josanne Romero	62 Haynes st E.B. Mass
Domenic J D'Amore JR.	62 Haynes St. E.B
Anthony D'Amore	62 Haynes St E.B
Joseph D'amore	62 Haynes St E. B. Mass.
J Cosgrove	106 Marginal St East Boston
Rita Valenti	112 Marginal St E. Boston
Louis Valenti	112 Marginal St E. Boston

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
Frank Sabelli	418 B SUMNER St	E Boston
THOMAS CLACKETT	418 SUMNER ST	E. BOSTON
MELINDA JONES	"	"
JESSA KNIGHTS	"	"
GREG COUCON	"	"
ERIC MURPHY	"	"
Rose Marie Doyle	52 Jeffries ST	E B
Angela Biscitelli	60 Frankfort St	E B
Kathy Mart	LYNN MASS	
Danielle Velasquez	LYNN MASS	
Helen Cheeus	1 Lamson St	E.B.
Dorothy M Leary	247 Webster St.	E.B.
Mary Cogswell	175 Coleridge St	E.B.
Richard Hutchinson	175 Coleridge St	E.B.
Rita Todisco	52A Marion St	E B
Rita Todisco	115 Bennington St	E.B
Joanne Nugent	176 Coleridge St	E.B

3 of 25

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
Lillian Fiore	72 Gladstone St. E. B.
Norma Wyatt	79 Winthrop St. Winthrop
Margaret Ford	101 Addison St. E.B.
Josephine Forgione	198 Leyden St EB Boston
Gloria Dempsey	141 Pomona St Revere
Rita Sullivan	46 Carleton St Revere
Josephine Powers	810 Border St E.B.
Lucy Verdura	Washington St Revere
Rose Cantino	105 addison St E'B
Louis Mavotta	951 SARATOGA ST. E.B.
Mary E Albanese	121 Prescott St E B
Joseph Forgione	198 Leyden St E.B.
James E Flutie	49 W. Eagle St E B
Clara L White	49 W. Eagle St. E.B.
Angelo Fiore	72 Gladstone St - E.B
Joy M LeBlanc	Saratoga ST
A. Jean Gelbert	Bennington St EB
Anne Gelbert	557 Bennington St E B
Del Marris	
Elena M. Vitale	20 Trenton St. E.B
Elizabeth D'Angelis	176 Brooks St E B

4 of 26

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
Stephen Tarrone	76 Trenton st Unit 1 Revere
Carmen Vee Lecci	192 Cottage St. E.B.
[illegible]	234 Bennington St. E.B.
Anthony Paolucci	37 Haynes St. East Boston
Anthony [illegible]	33 HEP. CIR. E. BOS.
[illegible]	192 Saratoga St E.B. Mass 2
Fred A Pecaro	5 Walden Winthrop, Ma
Joseph Martell	286 Revere St. Revere Ma.
Philip J. Spatola	599 Bennington E Boston
[illegible]	73 Maverick St. E.B.
Thomas G. Shea	6 Bisbee Rd Saugus, Mass
Charles Falino	255 Bradst. Ave Revere
[illegible]	63 C FEDERAL ST. Revere
Barbara J Starvis	274 Western Ave. Lynn, MA 01904
Ed Kelly	46 Sargent St. Winthrop Ma, 02152
[illegible]	114 Richard St Dublin MA
Arnold Speck	5 Burnside Rd Milton
David B Richardson	10 Sheridan Terr. Swampscott, Ma
Wilfred E Green	17 Margin St Lynn 01905
Glenn McGrand	2 Rogers Ave Lynn
[illegible]	37 Castle Malden
Sergeant [illegible]	4 Goodwin Ave. Revere

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport ~~and~~ do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
Richard Nugent	176 Coleridge St	E.B.
Joseph Tarantino	177 Coleridge St	E.B
Nancy Tarantino	177 Coleridge St	E.B
[illegible]	4 LAMSON ST	E.B
Angela Bubbico	5 Lamson St	E.B
[illegible]	5 Lamson St	E.B
[illegible]	[illegible]	E.B
[illegible]	7 Noble Ct.	East Boston 02128
[illegible]	"	" " "
Jennie Chiello	256 Marion St	E.B
[illegible]	60 Homer Street	East Boston, MA 02128
[illegible]	464 Maverick	[illegible]
[illegible]	372 Sumner St	EB
[illegible]	266 Newbury St	Peabody, Mass 01960
[illegible]	24 Neptune Cir	EAST B.

6 5/26 ✓

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
Marlene Pagliuca	159 Maverick St. E. Boston
Mary Ann Pardi	35 Everett St. E. B.
Joseph Pardi	35 Everett St. E. B.
Richard Pagliuca	159 Maverick St. E. Boston
Ann Pagliuca	217 Lexington St E. Boston
Paul Marcuilli	1124 Bennington St E. Boston
Mary Johnston	140 Wordsworth St E Boston
Kitty Ferro	217 Lexington St. E. Boston

7 of 16

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
[illegible]	17 Lamson St. E. Boston
[illegible]	[illegible]
Marlene Paglucia	159 Maverick St. E. Boston
Peter Cifrino	17 Lamson St E. Boston
Mary Ann Fardi	35 Everett St. E. B.
Angie Fardi	35 Everett St. E. B.
Joseph Fardi	35 Everett St. E. B.
Ken Nilsen	75 Everett St E. Boston
Richard Paglucia	159 Maverick St. E. Boston
Theresa Sirmo	257 Princeton St E. Boston
Ann Fadicia	247 Princeton St E. Boston
Lauren Clark	9 Lamson St E. Boston
Joe Cimino	7 Lamson St. E. Boston
Paul Marseille	1124 Bennington St. E. Boston
Mary Johnston	140 Wordsworth St E. Boston
Linda Ortiz	179 Fayerweather E. Boston
Ruth Sullo	211 Leverett St E. Boston
Chickie DeMeo	174 Bayswater St. E. Boston

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME ADDRESS

Jerry Deneumoustier 242 EVERETT. ST. E.B

Marie R. Deneumoustier 242 Everett St E.Bo.

Colette Deneumoustier 242 Everett St E.B.

Robert Osburn 444 Sumner St. East Boston Ma. 02128

Margaret L. Osburn 444 Sumner St. East Boston Ma.

[illegible] 344 Sumner St. E. Boston, Ma.

Joseph F. Gordon 347 Sumner St E Boston

Ozzie Mel 21 Jeffries ST. EB

[illegible] 232 Sumner St.

John Sordillo 244 Leyden St E

Gina Barry 194 Leyden St E.B.

KATHIE JULIANO 194 Leyden St E. B.

Dikos J LAMATINA 7 Drake PLACE E.B.

Mary Roach 37 Drake Place E.B.

[illegible] Sordillo 49 WALDEMAR AVE WINTHROP

Carol Mangano 52 Kilburn St Revere. Ma.

Mercedes 90 Lovell Winthrop Ma

Beverly Banks 690 Saratoga St E Boston

Robert E Banks 690 Saratoga St East Boston

Lillian Comeau 20 Meadow Brook Rd Lynn MA

Gordon Osburn 2 Meadow Brook Rd Lynn

Ann Lawrence 512 Bennington St E. Boston

9/1/04

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
John Lawrence	512 Bennington St.
Thelma Cacchiotti	19 Lamson St. E 13
Chris Cacchiotti	19 Lamson St. E, 13

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
Theresa Donato	114 Everett	E. B.
Diana C. Miller	72 Marginal ST	E.B.
Marion Miller	72 Marginal ST	E.B.
George J. Gambale	21 Lamson	W. Roxj

11 of 26

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
Suzanne Morcelli	Seare ST.	E.B.
Charles Thompson	86 Bellingham st	Chelsea
Teddy Cole	17 Decker st	E.B.
[illegible]	224 Saratoga	E.B.
[illegible]	102 Paris	E.B.
Jason Baker	226 Saratoga	E.B
[illegible]	120 Everett st	E B
Justin DeFreitas	120 Everett st	E.B.

1 of 26

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
Viola Bertulli	1111 Saratoga St	E B
Martha Campo	132 Marginal St	E B
Anne M Connors	54 Border	E B
Sarah Burgoyne	561 Saratoga St	E B
Nancy Brown	71 Leyden St	E. Boston
Cynthia Weir		E Boston
Jos Maguire	58 Jasper	Saugus
Phyllis Cicolone	64 Halstead St	Saugus
Ann Smyth	5 Fairmont Pl	Saugus
Jeanne Scaduto	66 Webster St	E.B.
Mario Scaduto	66 Webster St	E.B.
Rita Valente	112 Marginal St.	E.B.
Don Valente	112 Marginal St.	E.B.
Karen Siciliano	94 Webster St.	E.B.
Alfred Siciliano	94 Webster St.	E.B.
Jeanne Belmonte	66 Webster St	E.B.
John Belmonte	66 Webster St	E.B.

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
Carmella Lightbody	537 Bennington St. E.
Mary F Rennie	16 Walley St E. Bos
Harrison J. Fisher	54 Genesee St Revere
Dorothy Gagnon	
Lucy Lopes	41 Lamson St. East Boston

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
Tannis Tavares	422 Sumner St East Boston
Jay Benson	210 Webster St EB 02128
Theresa Cifelino	17 Lamson St. E. Boston
Joseph J. Mason	44 Everett St E. Boston
Virginia McColgan	467 Sumner St E Boston
Mary E. Siracusa	474 Sumner St. E B. 02128

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME ADDRESS

Ramon Valeyte 112 Marginal St E.B.
Anthony Sasso 41 Haynes St E.B.
Elizabeth Fernandez 41 Haynes St E.B.
Steve Giorgio 406 Meridian St E.B.
Sandra Gamble 333 Maverick St. E.B.
Alfonso Gamble 333 Maverick St E.B.
Michelle Sasso 333 Maverick St E.B.
Marilyn Scott 363 Maverick St EB.
Sean Scott 363 Maverick St E.B.
Mr + Mrs Martin Scott, 316 Carter St. Chelsea
[illegible] 169 Condor St E. Boston
[illegible] 17 Condor St E. B
[illegible] 793 Saratoga St E B
[illegible] 793 Saratoga St E B

1 of 2

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
Bonnie Lavoie	422 Sumner St East Boston
Jay Benson	210 Webster St EB 02128
Joseph J. Mason	44 Everett St E.B. Mass.
Theresa Capriano	17 Lamson ct. E Boston, Ma.
Virginia McColgan	467 Sumner St E Boston Ma 02128
Mary E Siracusa	474 Sumner St. E B 02128

20 of 26

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
[illegible]	121 Falcon St #1	East Boston MA 02128
Arthur M Cardoza	85 Condor St	E. Boston MA 02128
[illegible]	61 Trenton St	E Boston 02128
[illegible]	221 Webster #1	E Boston 02128
Kempton Memmott	209 Trenton St	E Bos MA 02128
Debra L. Conte	82 Leyden St	EB Ma 02128
Cheryl Gamdale	169 Condor St	E B M. 02128
Antonio P Gamdale	169 CONDOR ST	E BOSTON MA 02128
Jeanne Fonzo	40 Falcon St.	E Boston 02128
[illegible]	40 Falcon St	E B 02128
Celia Plazenza	46 Saratoga St	E B 02128

2/01/26

Jeffries Point Neighborhood Association and Impacted Communities

We the undersigned are opposed to " Logan Airside Improvement Plan" (the proposed construction of Runway 14/32, the Centerfield Taxiway at Logan Airport, and the lowering of the minimum.) There are far too many unanswered question to allow the runways to be built. The proposed runways will affect our Quality of Life. The people who currently reside in the impacted communities currently experience traffic congestion, noise, and a polluted environment from the planes, automobiles, trucks, busses and other Massport related operations.

NAME	ADDRESS
Maria Chiarti	394 Chelsea St. E.B.
Jeanne Scudieto	66 Webster St. E.B.
Mario Scudieto	66 Webster St. E.B.
Michael P. Clarke	389 Sumner St. E.B.
Lydia R. M. Kola	389 Sumner St. E.B.
Daniela Panzini	118 Bremen St E.B.
Jeanne Vanhof	163 Cottage ST E.B.
Paolina Lafiotta	36 Lexington St E.B.
Grace Montagnino	117 Cottage St E.B. Ma.
Frank C. Leone	164 Eutaw St E.B. Ma.

...Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
Lilly Schacht	239 Everett St	E. Boston
Al Schacht	239 Everett St	E. Boston
Renee Scalfani	361 Sumner St.	E. Boston
Millie Tejo	483 Sumner St	E Boston
Loretta Scalfani	361 Sumner St.	E.B
[illegible]	345 SUMNER ST	E.B
JUREMA PEPE	349 SUMNER ST #1	E.B
Christine Cinelli	99 Webster st	EB
Kay Swindle	361 Sumner st	E.B.
GARY TUTTLE	2 BRIGHAM ST	EAST BOSTON

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
Angela Buscetti	60 Bramhall St	
Carmella Perrone	227 Maverick St.	E.B.
Theodora Miller	34 Frankfort St.	E.B.
Lucy Balla	8 A Brien Terr	E.B.
Janet Galante	99 Dove	E.B.
Filomena Greco	111 Lexington St	E.B. Mass.
Pamela Barzini	118 Bremen St	E.B.
Mary Lou Loglisci	104 Bremen St.	E.B.
Louise Vonhof	163 Cottage ST	E.B.
Theresa Dorato	111 Everett.	E.B.

24 MAR

Jeffries Point Neighborhood Association and Impacted Communities

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
William Eppie	275 Sumner St	
[illegible]	[illegible]	
[illegible]	[illegible]	
[illegible]	[illegible]	
[illegible]	[illegible]	
[illegible]	[illegible]	
[illegible]	[illegible]	
[illegible]	[illegible]	
[illegible]	[illegible]	
[illegible]	[illegible]	

26 of 36

Communities Against Runway Expansion

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further erode our quality of life. It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New Engiand, then let the rest of New England share in its impact.

Name	Address	City or town
Susan Gellerman	59 Temple Place	Boston
George Varga	88 Robinwood Ave #2	Jamaica Plain
Patricia Y. Rand	17 Belmont St.	Newton 0245
Nan Ding	526 Washington St.	Boston 02132
Short Times	29 Hancock Street	Boston, MA 0211
Mary Vercouteren	75 St. Alphonsus	Boston, MA
Phil Kibat	2 Brigham St	East Boston
Maureen Flaherty	117 Sheridan St	Jamaica Plain
Wanda Diaz	50 Huntington Ave	Quincy 02169
Mary L. Kelly	49 Westmoreland St.	Dorchester
Nancy Farrell	27 Willow Cres Brookline	02445
Carol Matzka	52 Waldeck St	Dorchester 021
Lina Sheth	18 Montrose St #2	Somerville, MA 021
Briana Pham	11 PARK St #2	Dorchester, MA 021
John T. Wang	9 Hawthorne Pl. #10K	Boston, MA 02114
Zamari Salcedo-Vaz	18 O'Rourke Path	Newton, MA 02459
Valerie J. Green	59 Temple pl	BOSTON

Communities Against Runway Expansion

SUPPORT: REGIONAL TRANSPORTATION PLANNING
rail development
use of alternate regional airports
NO LOGAN INTERNATIONAL AIRPORT EXPANSION!

Massport is pushing for major expansion at Logan International Airport which will eventually lead to increased flights, noise and pollution over, and in, our neighborhoods and surrounding communities. The new projects will further **erode our quality of life.** It will also be inadequate to handle the increased demand soon after it is built. We, the undersigned, demand that Massport and do the necessary regional transportation planning fully, including high-speed and other rail development for the Greater Boston area before enbarking on any expansion project. If Logan Airport is an "economic engine" for New England, then let the rest of New England share in its impact.

Name	Address	City or town
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
[illegible]	340 Main St.	Malden
[illegible]	1008 Paradise Rd.	Swampscott
[illegible]	21 Bateman Ave	Revere
[illegible]	13 Bolton Place	Boston
[illegible]	[illegible]	[illegible]
[illegible]	27 Ithaca Ave	Winthrop MA
[illegible]	247 Baldwin Ave	Revere MA
[illegible]	241 Proctor Ave	Revere Ma
[illegible]	29-6 Concord Ave	Concord, Ma
[illegible]	1167 Boylston St. 16	Boston
[illegible]	5165 Metropolitan Ave	Hyde Park
[illegible]	3 Fenton St	Boston
Richard Gomes	1595 Beacon St.	Brookline
Hal Fishbein	220 Boylston St.	Boston
Aida Medeiros	52 Temple Place	Boston

Letter 122
Jeffries Point Neighborhood Association
Karen M. Maddalena, Chairperson

Code	Topic 1	Topic 2	Comment	Response
122.1	Environmental Review Process	MEPA	Massport's draft environmental impact study (EIS/EIR) did not rigorously explore all reasonable alternatives.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's *Logan Capacity Enhancement Plan* (October 1992); the *Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study* (December 1993); the *Logan Final GEIR* (July 1993); and the *Logan Airside Improvements Feasibility Study, Phase 1 Report*, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its *Boston Logan International Airport Capacity Enhancement Plan*. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the *Logan Airside Feasibility Study*, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.
122.2	Analysis Assumptions/ Methodologies	Base Year	Massport supported its conclusions with outdated studies and figures.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
122.3	Alternatives	Runway 14/32	There can be no guarantee of "unidirectional use" of Runway 14/32. This is an FAA decision and the FAA is making no such guarantee.	The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (*i.e.*, all aircra arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 1 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirection limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel an Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32. The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.
122.4	Delay	Model	FAA modeling was not used. FAA data shows delay reduction since 1993. Massport's delay figures are inflated.	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. It includes a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport. The FAA Technical Center was responsible for the capacity and delay results in the 1992 FAA Capacity Enhancement Report for Logan Airport that concluded the need for Runway 14/32, reduced minimums and taxiway improvements. The Technical Center simulated Logan Airport airfield operations with the RDSIM model and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Airside Project Draft EIS/EIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates in 1992 with those of the Logan Airside Project estimates. The FAA has concluded that the Airside delays represent "a plausible and conservative estimate...." The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States Logan Airport's estimated annual delay hours are over five times the FAA's 20,000-hour threshold for a severely delayed airport.

Code	Topic 1	Topic 2	Comment	Response
122.5	Noise	Sound Insulation	Soundproofing cannot mitigate the impact of this increase in noise and air pollution.	While sound insulation does not mitigate exterior sound levels, it is a widely accepted measure considered appropriate for general mitigation of noise impacts. Sound insulation reduces noise inside the home. While the implementation of the Preferred Alternative would bring additional homes within the criteria for inclusion in the sound insulation program, the inside of these homes will have lower noise levels than they would have had without sound insulation under the No Action Alternative. The emissions inventories for future conditions and alternatives are contained in Section 6.4 of the Supplemental DEIS/FEIR and Appendix F. These inventories show that all Alternatives, including the No Action and Preferred Alternative, are well within acceptable criteria. In addition, dispersion modeling indicates no violation of the NAAQS for the pollutants analyzed (CO, NO and PM_{10}) under any alternative and future year.
122.6	Public Health	Effects	Huge issues such as air pollution and respiratory health, unequal impacts, secondary ground traffic and others are ignored or glossed over, enough so that in truth, one might well ask if there is anything good to be said about it.	Noise was identified as the only off-airport impact from the Preferred Alternative (see Section 6.2 of the Supplemental Draft EIS/Final EIR for a discussion on noise impacts). Because of improved airfield efficiency and shorter delay periods, the Preferred Alternative is projected to slightly reduce air emissions when compared to the No Action Alternative. The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental Draft EIS/Final EIR. A review of the available information did not indicate any causal relationship based on proximity to the airport. Construction will be managed to minimize air, noise and other impacts to the adjacent communities. All construction vehicles will be required to use designated truck routes and avoid local streets.

LETTER 123

GOULSTON & STORRS
A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW
400 ATLANTIC AVENUE
BOSTON, MASSACHUSETTS 02110-3333
(617) 482-1776

TELECOPY/FAX (617) 574-4112

April 21, 1999

BY OVERNIGHT COURIER

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley – EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, Massachusetts 02202

John C. Silva
Manager, Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Re: Comments to Draft Environmental Impact Statement
and Draft Environmental Impact Report ("Draft EIS/EIR")
Logan Airside Improvements Planning Project (February 1999)

Dear Messrs. Pugsley and Silva:

These comments are submitted on behalf of our client, LaSalle Hotel Operating Partnership, L.P. ("LaSalle"). Pursuant to LaSalle's Ground Lease with Massport, LaSalle owns the Hyatt Harborside Hotel located at 101 Harborside Drive at Logan International Airport. As the owner of the Hyatt Harborside Hotel, which in addition to providing conference center services, provides accommodations for visitors, tourists and business travelers alike, LaSalle is interested in the proposals set forth in the Draft EIS/EIR that would enhance travel and tourism in Boston and the greater New England region. LaSalle believes that first-class hotel accommodations and conference center facilities play a vital role in attracting and accommodating visitors to the Boston area and have wide-ranging positive economic affects on the region. On behalf of LaSalle's guests, including those from the surrounding communities, we appreciate this opportunity to pose some concerns and questions regarding certain aspects of the Draft EIS/EIR.

LaSalle wishes to voice its opposition to Layout Option A, which according to the Draft EIS/EIR places Runway 14/32 in such close proximity to the Hyatt Harborside Hotel as to raise significant safety, noise and operational concerns that cannot be mitigated. Moreover, Layout Option A would remove 174 parking spaces (or 71% of available parking) from the Hyatt Harborside Hotel, significantly hampering LaSalle's ability to attract guests and operate the Hotel. Such a layout would effectively eliminate LaSalle's ability to attract guests for the conference facilities and operate guest accommodations. As stated in the Draft EIS/EIR, no viable option for parking for the Hyatt Harborside Hotel would be available if Layout Option A moved forward. Layout Option A would, in effect, destroy LaSalle's multi-million dollar investment at Logan. 123.1

In general, LaSalle supports Massport's goal of improving service at Logan through means other than Layout Option A. It would, however, be helpful to have the proponent address certain issues more specifically or direct us to the existing studies that address these issues. In particular, the issues are as follows: (i) the noise impact on the Hotel; (ii) the light impact on the Hotel; (iii) the impact on air quality surrounding the Hotel; (iv) any mitigating steps that might be available to lessen the noise, light, or air quality impacts on the Hotel and who is responsible for the costs of such actions; (v) the area to which airplane parking positions would be relocated; (vi) safety factors for the Hotel's premises and mitigating actions that may be necessary; and (vii) access to and from the Hotel and any possible relocation of Harborside Drive. 123.2 123.3

LaSalle would appreciate the opportunity to review the above matters with Massport prior to Massport filing its Final EIR/EIS so that we can understand the impacts of Massport's proposal and are satisfied that Massport is committed to providing adequate mitigation measures.

Respectfully submitted,

Michael J. Haroz
as attorney for and on behalf of LaSalle Hotel Operating Partnership, L.P.

cc: Peter Blute, Massport Executive Director
Betty J. Desrosiers, Massport Director, Aviation Planning & Development
Todd Noonan, LaSalle Vice President
David J. Martin, Hyatt General Manager

GSDocs-757865-3

Letter 123
LaSalle Hotel Operating Partnership c/o Goulston & Storrs, Michael J. Haroz (as attorney on behalf of LaSalle Hotel Operating Partnership, L.P.)

Code	Topic 1	Topic 2	Comment	Response
123.1	Alternatives	Runway 14/32	LaSalle wishes to voice its opposition to Layout Option A, ...Layout Option A would remove 174 parking spaces... significantly hampering LaSalle's ability to attract guests... no viable option for parking for the Hyatt Harborside Hotel would be available if Layout Option A moved forward.	Refer to Section 8.2 of the Supplemental DEIS/FEIR, which clearly states that Option C is the preferred layout for Runway 14/32.
123.2	Alternatives	Runway 14/32	In general, LaSalle supports Massport's goal of improving service at Logan through means other than Layout Option A.	Refer to response to Comment 123.1.
123.3	Alternatives	Runway 14/32	Issues affecting the Hyatt Harborside Hotel such as noise, light, air quality, mitigation, airplane parking positions, safety factors, and access to and from Harborside Drive should be addressed more specifically.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* (previously the GEIR) and its updates.

Logan Airlines Management Council

LAMCO

April 7, 1999

LETTER 124



Secretary of Environmental Affairs
Attn.: MEPA
Mr. Arthur Pugsley
EOEA #10458
100 Cambridge St. - 20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

124.1

We, the undersigned executive board members of LAMCO (Logan Airlines Management Council), wish to express our support for the series of airside improvements currently proposed by MASSPORT. In an effort to reduce delays and improve efficiency on Logan's airfield, we support the following projects:

*Construction of a uni-directional runway 14/32 for over the water operations.

*Construction of a centerfield taxiway to reduce taxiway congestion.

*Realignment and extension of existing taxiways to enhance airfield safety.

*Reduction of approach minimums on runways to upgrade Logan Airport to industry standards.

The Logan Airlines Management Council is comprised of the following member carriers:

Aer Lingus	Air Canada
Air France	America West
Alitalia	American
Atlantic Coast Airlines	

Logan Airlines Management Council

LAMCO



British Airways	Business Express
Cape Air	Continental
Delta	Delta Shuttle
Eastwind	Frontier
Icelandair	Korean
LufthansaMidway	Midwest Express
Northwest	Olympic Airways
Sun Country	Swissair
TAP/Air Portugal	TWA
Trans States	United
USAirways	USAirways Shuttle
US Airways Express	Virgin Atlantic Airways

On behalf of the over 26 million customers using Logan Airport, we strongly reiterate our support for EOEA #10458.

Sincerely,

LAMCO

Charles Ferrara, President
Speros Frangules, Vice President
Robert Costello, Secretary/Treasurer

Letter 124
Logan Airlines Management Council
Charles Ferrara, President

Code	Topic 1	Topic 2	Comment	Response
124.1	Purpose and Need	Delay	We, the undersigned executive board members of LAMCO (Logan Airlines Management Council), wish to express our support for the series of airside improvements currently proposed by Massport...to reduce delays and improve efficiency on Logan's airfield....	Comment noted.

LOGAN AIRLINES MANAGEMENT COUNCIL

April 7, 1999

LETTER 125

Secretary of Environmental Affairs
ATTN: MEPA
Mr. Arthur Pugsley
EOEA #10458
100 Cambridge St. - 20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

We, the undersigned co-chairpersons of the LAMCO (Logan Airlines Management Council) Cargo sub-committee wish to express our support for the series of airside improvements currently proposed by Massport. In an effort to reduce delay and improve efficiency on Logan's airfield, we support the following projects: 125.1

- ⇒ Construction of an uni-directional runway 14/32 for over the water operations.
- ⇒ Construction of a centerfield taxiway to reduce taxiway congestion.
- ⇒ Realignment and extension of existing taxiways to enhance airfield safety.
- ⇒ Reduction of approach minimums on runways to upgrade Logan Airport to industry standards.

On behalf of our Customers, who annually ship over 814 million tons of cargo and mail in and out of Logan Airport, we strongly reiterate our support for the Logan Airside Improvement Planning Project (EOEA #10458).

Sincerely,

Jeff Ealy	Enrico Miranda	William Taylor
Co-Chairperson	Co-Chairperson	Co-Chairperson

CARGO SUBCOMMITTEE

Letter 125
Logan Airlines Management Council Cargo Subcommittee, Co-Chairpersons

Code	Topic 1	Topic 2	Comment	Response
125.1	Purpose and Need	Delay	We, the undersigned co-chairpersons of the LAMCO (Logan Airlines Management Council) Cargo sub-committee wish to express our support for the series of airside improvements currently proposed by Massport...to reduce delay and improve efficiency on Logan's airfield....	Comment noted.

LETTER 126

Manchester Airport
One Airport Road
Suite 300
Manchester, NH
03103-3395
Tel: 603-624-6539
Fax: 603-666-4101
http://www.flymanchester.com

Alfred Testa, Jr.
Director

02 April 1999

Mr. Arthur Pugsley - EOEA No. 10458
Secretary of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

Please accept this letter as a comment on Logan Airport's Airside Improvements Project. There have been many comments made by various officials regarding Massport's dedication and commitment to a regional approach for the mitigation of impacts.

I wish to assure you as Director of Manchester Airport that for the past five years Massport has worked diligently with the regional airports of New England in an effort to find some regional solutions to the congestion at Logan Airport. These meetings have resulted in various approaches for many of the regional airports depending upon their ability to take on more traffic, and their proximity to Logan Airport. Massport's work with Worcester Airport is well noted and I need not comment on it here. 126.1

The unprecedented growth at T.F. Green in Providence and Manchester Airport in New Hampshire is a testament to the regional approach we all have been taking. However, one must understand that Logan's Airside Improvements are complimentary to the hundreds of millions of dollars of improvements already done at T.F. Green and Manchester Airport. One will not work without the other. For airports that are further away in distance from Logan, peak hour pricing is a very viable and supportable solution. 126.2 126.3

I cannot reiterate strongly enough how much Massport has been involved in the regional attempt to mitigate traffic congestion, but, I must also strongly emphasis that no matter how much increased air traffic Providence and Manchester may be able to manage, Logan must still improve its airside efficiency. 126.4

I am moving on to become the Director of Philadelphia International Airport where, by the way, a uni-directional commuter runway is under construction for exactly the same reasons Logan is seeking to do the same.

If you have any questions, please do not hesitate to call me at Philadelphia International Airport.

Sincerely,

Alfred Testa, Jr.
Airport Director

AT/ds

cc: Betty Desrosiers/Massport

Letter 126
Manchester Airport
Alfred Testa Jr., Airport Director

Code	Topic 1	Topic 2	Comment	Response
126.1	Regional Transportation	Regional Airports	I wish to assure you as Director of Manchester Airport that for the past five years Massport has worked diligently with the regional airports of New England in an effort to find some regional solutions to the congestion at Logan Airport.	Comment noted.
126.2	Regional Transportation	Regional Airports	...Logan's Airside Improvements are complimentary to the hundreds of millions of dollars of improvements already done at T.F. Green and Manchester Airport. One will not work without the other.	Comment noted.
126.3	Regional Transportation	Regional Airports	For airports that are further away in distance from Logan, peak hour pricing is a very viable and supportable solution.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport. See Section 4.5 of the Supplemental DEIS/FEIR.
126.4	Purpose and Need	Delay	...no matter how much increased air traffic Providence and Manchester may be able to manage, Logan must still improve its airside efficiency.	Comment noted.

LETTER 127

Massachusetts Audubon Society
208 South Great Road
Lincoln, Massachusetts 01773
(781) 259-9500 April 22, 1998

Robert Durand, Secretary
Executive Office of Environmental Affairs
Arthur Pugsley, EOEA #10458
100 Cambridge St., 20th Floor
Boston, MA 02202

Attention: MEPA Unit

Re: **EOEA #10458, Logan Airside Improvements, Boston and Winthrop**

Dear Secretary Durand:

On behalf of the Massachusetts Audubon Society, I submit the following comments on the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the above-referenced project.

The Massachusetts Audubon Society has not conducted an in-depth review of this document, therefore our comments will be limited to two aspects: general transportation planning issues and proposed rare species impact mitigation.

Transportation Planning

Massport has proposed these airside improvement to alleviate current and future delays at Logan. Meanwhile, other related planning and transportation activities are ongoing, including the proposal for Massport to take over management of Worcester Airport, discussion of the roles of regional airports both within Massachusetts and in neighboring states, provision of high speed rail service to New York, and the North-South Rail Link project. All of these projects and activities have some bearing on the congestion situation at Logan. There are also environmental and community impacts associated with many of the alternatives under consideration, particularly the aviation alternatives. Decisions on the future configuration of the commonwealth's and New England's transportation networks have huge implications for land use and environmental quality. These decisions should not be based only on an uncoordinated series of independent environmental reviews for specific alternative projects. There should be some more centralized, organized approach which fully engages the public. The Massachusetts Environmental Policy Act (MEPA) process is a good mechanism for public participation, and we urge you to determine means of better coordinating the state's transportation improvement planning processes through MEPA. 127.1

The Draft EIR/EIS shows that alternatives to aviation travel, including increased reliance on rail and video conferencing, may divert up to 7.3 million passengers away from Logan in the year 2010 (Table 2.4-9). Nearly half of this diversion amount is attributed to diversion to other regional airports, which will transfer some of the impacts to other sites without fundamentally alleviating aviation impacts such as noise impacts on neighborhoods. However, this analysis does indicate that Logan passenger demand in 2010 may only increase to 30.2 million compared to 29 million today. Thus, it is clear that alternatives analysis

is critical for finding the region's most environmentally sound transportation solutions, and that this analysis must include consideration of other modes including the effects of two major rail projects: high speed rail to New York and the North-South Rail Link. Other options such as peak pricing deserve further consideration as well. At the same time, it should be recognized that some options, like the proposed expansion of the New Bedford airport, will have insignificant impacts on Logan's congestion situation (potentially diverting one cargo flight per day) while resulting in tremendous environmental impacts. The New Bedford project entails the largest wetland fill ever proposed in Massachusetts since the Wetlands Protection Regulations were promulgated in 1983. The relative utility and impacts of the full range of alternatives (aviation and non-aviation) should be considered and subjected to public review through the MEPA process. 127.2 127.3 127.4

Rare Species

Habitat of rare grassland birds, notably the state-endangered upland sandpiper, would be destroyed by the proposed central taxiway. The DEIR/EIS mentions the possibility of restoring grassland habitat at Camp Edwards on Cape Cod as part of a mitigation package for these impacts. One rational for off-site mitigation (or off-site mitigation combined with on-site mitigation) is the high risk of bird/aircraft collisions due to the high volume of flights at Logan. However, this off-site mitigation proposal requires substantial additional consultation among Massport, Massachusetts Natural Heritage and Endangered Species Program (MNHESP), and the military officials who control Camp Edwards. While off-site mitigation has the potential to benefit rare grassland birds, there are many details which remain unresolved, including permission for Massport to undertake such activities on Camp Edwards land and requirements for undertaking, monitoring, and maintaining grassland restoration. Massport should be required to pursue those consultations actively, and to submit a near-final, detailed mitigation plan with the Final EIR/EIS. 127.5

Conclusion

Many transportation improvement projects, including the proposed Logan expansion and some of the alternatives proposed to avoid the expansion, have large impacts of concern to the affected communities. These issues should be addressed in a fair manner, with a level playing field that allows comparison of relative impacts of various alternatives. The FEIR for this project should be required to more fully evaluate the role of Logan within a regional transportation system and to seek options which minimize environmental impacts at all locations. 127.6

Thank you for the opportunity to comment.

Sincerely,

E. Heidi Roddis
Environmental Policy Specialist

cc: Massport
Robert Bartanowicz, FAA
Elizabeth Higgins Congram, U.S. EPA
MNHESP

Letter 127
Massachusetts Audubon Society
E. Heidi Roddis, Environmental Policy Specialist

Code	Topic 1	Topic 2	Comment	Response
127.1	Environmental Review Process	MEPA	Decisions on the future configuration of the commonwealth's and New England's transportation networks have huge implications for land use and environmental quality. These decisions should not be based only on an uncoordinated series of independent environmental reviews for specific alternative projects. There should be some more centralized, organized approach which fully engages the public. The Massachusetts Environmental Policy Act (MEPA) process is a good mechanism for public participation, and we urge you to determine means of better coordinating the state's transportation improvement planning processes through MEPA.	Massport has actively encouraged regional transportation alternatives to Logan Airport, including rail. Massport supports intercity rail planning through its membership in the Boston Metropolitan Planning Organization (MPO). The MPO is a cooperative planning board whose membership also includes MassHighway, Metropolitan Area Planning Council; MBTA, and MBTA Advisory Board. As members of the MPO, Massport and these agencies are responsible for preparing the *Boston Transportation Improvement Program (TIP)* and the *Transportation Plan for the Boston Region*. In this capacity, Massport influences regional transportation plans for intercity rail. Massport also holds a seat on the Citizens Advisory Committee (CAC) of the MBTA's North-South Rail Link Project. The CAC met monthly and provided a forum for Massport and the MBTA to coordinate their ridership estimates and assessments of the relationship of the North-South Rail Link on airport access and airport usage. To date, the North-South Rail Link Project has not received funding and will not impact Logan Airport over the study time frame. Should the North-South Rail Link be constructed, resulting passenger diversions from Logan Airport to rail could reach 46,700 annual passengers, or less than one-half of one percent of Logan Airport's total annual traffic.
127.2	Regional Transportation	Regional Airports, Passenger Rail	...[An] alternatives analysis is critical for finding the region's most environmentally sound transportation solutions, and that this analysis must include consideration of other modes including the effects of two major rail projects: high speed rail to New York and the North-South Rail Link. Other options such as peak pricing deserve further consideration as well.	Refer to response to comment 127.1. Massport has actively encouraged regional transportation alternatives to Logan Airport, including rail. Massport supports intercity rail planning through its membership in the Boston Metropolitan Planning Organization (MPO). The MPO is a cooperative planning board whose membership also includes MassHighway, Metropolitan Area Planning Council; MBTA, and MBTA Advisory Board. As members of the MPO, Massport and these agencies are responsible for preparing the *Boston Transportation Improvement Program (TIP)* and the *Transportation Plan for the Boston Region*. In this capacity, Massport influences regional transportation plans for intercity rail. Massport also holds a seat on the Citizens Advisory Committee (CAC) of the MBTA's North-South Rail Link Project. The CAC met monthly and provided a forum for Massport and the MBTA to coordinate their ridership estimates and assessments of the relationship of the North-South Rail Link on airport access and airport usage. To date, the North-South Rail Link Project has not received funding and will not impact Logan Airport over the study time frame. Should the North-South Rail Link be constructed, resulting passenger diversions from Logan Airport to rail could reach 46,700 annual passengers, or less than one-half of one percent of Logan Airport's total annual traffic.

Code	Topic 1	Topic 2	Comment	Response
127.3	Regional Transportation	Regional Airports	...the proposed expansion of the New Bedford airport, will have insignificant impacts on Logan's congestion situation (potentially diverting one cargo flight per day) while resulting in tremendous environmental impacts.	Comment noted.
127.4	Environmental Review Process	MEPA	The relative utility and impacts of the full range of alternatives (aviation and non-aviation) should be considered and subjected to public review through the MEPA process.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advison Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.

Code	Topic 1	Topic 2	Comment	Response
127.5	Ecosystems	Rare Species	While off-site mitigation has the potential to benefit rare grassland birds, there are many details which remain unresolved, including permission for Massport to undertake such activities on Camp Edwards land and requirements for undertaking monitoring, and maintaining grassland restoration. Massport should be required to pursue those consultations actively, and to submit a near-final, detailed mitigation plan with the Final EIR/EIS.	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport from construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far exceeding the ±40 acres to be lost at Logan Airport. In the event that such a program at Camp Edwards is not available, an appropriate alternative program acceptable to the NHESP will be developed and implemented. Additional details of the Upland Sandpiper mitigation plan are presented in Section 6.5 of the Supplemental DEIS/FEIR.
127.6	Environmental Review Process	MEPA	The FEIR for this project should be required to more fully evaluate the role of Logan within a regional transportation system and to seek options which minimize environmental impacts at all locations.	In accordance with the MEPA Certificate on the Airside Project Draft EIS/EIR, the Supplemental DEIS/FEIR contains a summary of the environmental impacts of growth at the regional airports, based on existing available environmental documents and studies. Refer to Appendix B of the Supplemental DEIS/FEIR.

MBR
Massachusetts Business Roundtable

LETTER 128

April 7, 1999

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley-EOEA #10458
100 Cambridge Street
20th Floor
Boston, MA 02205

John C. Silva
Manager, Environmental Programs
Airports Division, ANE-600
New England Division
12 New England Executive Park
Burlington, MA 01803

RE: Draft EIR/EIS
Logan Airsides Improvement Project

Dear Sirs:

The Board of Directors of the Massachusetts Business Roundtable, a statewide organization of seventy-five of Massachusetts' leading chief executives, has recently voted unanimously to strongly support the opening of runway 14/32 and the creation of a new taxiway at Logan International Airport. 128.1

Over the last decade, the Governor and the Legislature have accomplished a great deal to improve the ability of Massachusetts' businesses to grow, create jobs, and compete with companies based in other states and around the world.

However, the growth of our current economy will not continue forever and, not withstanding the efforts of the Legislature and the Governor, Massachusetts has higher costs of living and of doing business than almost any other state in the country. Predictable and efficient air travel for employees, customers and goods are a key component of any company's ability to grow and to compete. This runway will help our state leaders to prepare for the future and to ensure that Massachusetts businesses have a level playing field to compete and create jobs, even in less positive economic times. 128.2

This proposal is not an expansion of Logan and will not result in an increase in flights. The reduction of weather related delays will enhance safety, allow Massport to utilize Logan's existing allowable daily capacity to its utmost, and have a positive ripple effect on other airports on the East Coast. It will reduce air and noise pollution over surrounding residential areas, and move a greater number of takeoffs and landings over the harbor.

The ability of Massachusetts' businesses to expand and to create jobs, in good times and bad, depends on their ability to move employees, customers and goods into and out of Massachusetts. The efficient use of Logan's existing

capacity, through this runway and taxiway, will allow our businesses to continue to create jobs here in Massachusetts and to compete nationally and around the world.

The Massachusetts Business Roundtable would be pleased to work with you in any way to address this critical issue.

Sincerely,

Nader Darehshori

Nader F. Darehshori
Chairman
Massachusetts Business Roundtable
Chairman, President and Chief Executive Office
Houghton Mifflin Company

Letter 128
Massachusetts Business Roundtable
Nader F. Darehshori, Chairman

Code	Topic 1	Topic 2	Comment	Response
128.1	Alternatives	Runway 14/32	The Board of Directors of the Massachusetts Business Roundtable...has recently voted unanimously to strongly support the opening of runway 14/32 and the creation of a new taxiway at Logan International Airport.	Comment noted.
128.2	Purpose and Need	Economic Impacts	Predictable and efficient air travel for employees, customers, and goods are a key component of any company's ability to grow and to compete. ...[The proposed new] runway will help our state leaders to prepare for the future and to ensure that Massachusetts businesses have a level playing field to compete and create jobs, even in less positive economic times.	Comment noted.

LETTER 129

MASSACHUSETTS SIERRA CLUB

100 Boylston Street Boston MA 02116 (617) 423-5775 fax (617) 423-5858

Bob Durand, Secretary
Executive Office of Environmental Affairs, Attention: MEPA Office
Mr. Authur Pugsley, EOEA No. 10458
100 Cambridge Street, Room 2000
Boston, MA 02202

John C. Silva, Manager
Environmental Programs
Airports Division, ANE - 600
New England Region
12 New England Executive Park
Burlington, MA 01803

April 22, 1999

Re: Massachusetts Port Authority (MPA) Logan Airside Improvements Planning Project ("Project") DEIS/DEIR - **EOEA No. 10458**
Boston-Logan International Airport

The Massachusetts Chapter of the Sierra Club (the Club) with over 20,000 members, including the Greater Boston Group with over 7,000 members, request that the Secretary of Environmental Affairs (the Secretary) and the FAA determine that significant planning deficiencies exist in the DEIS/DEIR of the Logan Airside Improvements Planning Project ("Project") that must be addressed; that the document be found "**INADEQUATE**"; and that a new Draft document be required. Each of the major three parts; the proposed runway 14/32, the centerfield taxiway between the 4/22 runways, and the lowering of the minimum have major environmental impacts for the greater Boston metropolitan area which have not been adequately addressed. In addition, the data and studies used are outdated and a 1998 base year should be required with the planning period extended from 2010 to at least 2020. 129.1 129.2 129.3

The Club furthers wishes to go on record concerning the conflict of interest that exists for the FAA to be a proponent for the Project and then also one of the decision makers in determining the Project's adequacy. We strongly request that the EPA take the lead role for any decision making because of this conflict. 129.4

Please note our major concerns:

1. **A comprehensive Northeast regional transportation plan, including all forms of transportation, needs to be developed and subjected to public review before any further airport expansion is allowed** 129.5

The study area must include the Federal Aviation Administration's **Eastern** and **New England** regions with a goal of identifying and quantifying long range airside, landside and groundside demand requirements. The present system of piecemeal airport expansion throughout the Northeast has become counterproductive, with each airport justifying projects seemingly based on parochial competition rather than regional cooperation. 129.6

The Club realizes that we are asking for a drastic remedy for what is supposed to be a local issue, but this isn't just a local Massachusetts issue and the answers won't come from just looking at Logan Airport. All throughout the Northeast, the same questions and concerns are being raised by more and more residents and groups as to the environmental and economic consequences of

polices that were put into place many years ago before airline deregulation and the enormous growth of airline traffic. As the DEIS/DEIR reminds us, over 100 homes and a church are to be taken for the expansion of the Manchester, NH airport.

The scope for such a study should include, but not be limited to:

- an inventory of all airports and associated planned regional airside and landside projects.
- existing and planned rail passenger services(both Amtrak and commuter rail).
- an inventory of underutilized railroad rights of way and potential uses.
- an analysis of future high speed rail initiatives.
- an inventory of the existing interstate highway system and any planned system expansion.
- an analysis of regional air cargo demand 129.7
- a discussion of how airports with constrained landside expansion potential deal with airside capacity issues.
- all environmental impacts on wetlands, waterways, flora, fauna, and human, including health studies as well as air, noise and odor impacts.
- potential for future reduction in peak time business trips due to improvements in teleconferencing.
- The implications on regional airside planning of NLA's(New Large Aircraft) - more later.
- The implications on regional groundside planning of the construction of the North/South Rail Link - more later.

This study should be accomplished with the cooperation of all interested parties including, but not limited to, residents, businesses, and organizations.
The goal of the above study would be to determine the least invasive environmental impacts of future transportation developments needed to meet the region's requirements for future long term growth. Segmental planning cannot and should not be tolerated.

129.8

2. **The North/South Rail Link must be a integral part of the planning process for Logan or any other regional airport expansion projects.**

The ridership figures referenced in Massport's DEIS/DEIR for the proposed North/South Rail Link project are in ***draft*** form and have not been reviewed by the Rail Link CAC (Citizen's Advisory Committee) established by EOEA as part of an ongoing process to evaluate the MIS(Major Investment Study)/DEIS/DEIR(**EOEA 10270**) for the Rail Link project. Members of the Rail Link CAC have serious concerns with the intercity(Amtrak) numbers for trips originating and terminating north of Boston, as well as potential diversions from airside demand. 129.9
The Club feels that the low estimates for Rail Link airside Logan diversions have more to do with artificial constraints, primarily parking supply, than with actual Northeast Corridor ridership potential. For example, lack of sufficient parking for Amtrak riders at Route 128 Station has long been considered to be a formidable disincentive for potential rail passengers. The provision of adequate parking at the new Woburn Transportation Center(tentatively identified in the draft Rail Link MIS/EIS/EIR as the initial terminus of Amtrak's high speed service) should generate significantly more airside diversions from Logan than presently referenced.
With the Rail Link in place, New York City will be accessible in about three and one half hours from Woburn! With the Rail Link in place, proposed T.F. Greene commuter rail service from Boston could be extended to any number of Northside destinations! With the Rail Link in place, some Amtrak Northeast Corridor services will be extended to Portland Maine and beyond; while others could be extended into Nashua, New Hampshire and beyond!
In any case, Massport's DEIS/DEIR should be withdrawn pending the completion of the Rail Link MIS/DEIS/DEIR, and the incorporation of its findings into a regional transportation study. 129.10
The Rail Link CAC is also concerned that the MIS/DEIS/DEIR for the Rail Link project is significantly behind schedule. This sorry state of affairs seems to be due more to internal

Massachusetts political squabbling over funding for future local Boston transit projects, rather than as a judgment of the potential value of the Rail Link.
The Rail Link has always been recognized as a project of ***"Regional and National Significance"*** and not just as a local Boston transit project. Funding for the Rail Link must be on a regional basis and be based on the benefits accruing to the entire Northeast, as well as Massachusetts, from the extension of Amtrak's Northeast Corridor to the north of Boston.

3. **The impact of New Large Aircraft (NLA) must be quantified as to their impacts on Logan and other regional airports.** 129.11

There is another trend that impacts the 14/32 runway project.
According to sources in the aviation community, 2003 will see the start of commercial availability of NLAs from Boeing and Airbus Industrie, i.e. New Large Airplanes with a capacity of up to 1000 persons per airplane and needing runways up to 11,000 feet in length. It is inconceivable that Massport is not engaged in some sort of internal planning process with the aim of accommodating NLAs though so far there has been no mention. Since NLAs take a lot of space on the ground, 14/32 might be important to provide more runway and taxiway space for the safe and efficient operation while NLA aircraft use existing runways. These existing runways would need to be extended for the NLAs and many small to medium aircraft would be diverted to 14/32. In short, 14/32 would help clear the way for NLAs at Logan.
It follows that the accommodation of NLAs at Logan will affect terminal building layout and construction, and all aspects of ground transportation.
It is important to ask Massport to describe what plans, if any, have been made to address the impacts of NLAs. And if such an effort is ongoing, the result is segmentation of the EIS/EIR process which is not legal, especially when the runway 14/32 project would be a small part of an EIS/EIR looking at Logan expansion as a whole. 129.12

4. **The reopening of a discussion regarding the construction of a second major airport is counterproductive at this time and would preclude the discipline necessary for any true analysis of transportation alternatives.** 129.13

5. **Any discussions of future regional airport development must be based on reality and not just on wishful thinking.**

The Sierra Club and others are presently contesting New Bedford's proposed airside expansion due to the significant amount of wetlands filling involved. Because of our environmental concerns, the Club has had to review the "purpose and need" justification for this project, and we have yet to find any overwhelming economic "need" that would necessitate the proposed action. Yet, New Bedford, as well as other regional airports, continue to pop up as potential candidates for everything from commuter to air cargo operations.

Additional concerns are as follows.

The MPA makes the claim in their transmission letter of February 19, 1999 that, "...the lapse of time between the publication of the ENF and the publication of notice availability of this Draft EIR *has no adverse environmental consequences...*" This is very much open to discussion as weather conditions alone have dramatically changed over the last five years because of the El Nino and La Nina effects. FAA delay data (DELAYSIM) shows that Logan's delay situation has improved since 1993 and is essentially in equilibrium. The entire analysis in the document needs to be updated. 129.14
The Sierra Club urges the Secretary and FAA to require the MPA to change the base year for planning for the project to calendar year 1998; to revise all presentations in the DEIS/DEIR, including the appendices thereto, to reflect the changes; to extend the planning period to 2020 129.15

from 2010 with concomitant revisions in projected levels of activity and impact and to require that the DEIS/DEIR be republished.

Massport has not met the requirements of the National Environmental Policy Act (40 CFR Part 1502 Environmental Impact Statements) which requires:

1. the DEIS/DEIS to ***"Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated".*** [i]

129.16

A reasonable person could expect the DEIS/DEIR alternatives to include, but not be limited to, the following:

129.17

- Consideration of Implementing a High-Density Rule (Slots).
- Consider Implementation of FAR Part 161 regulations to provide aircraft noise and access restrictions for Stage 2 and Stage 3 operations at Logan in order to provide noise relief to affected communities.
- Thorough regional transportation planning, including rail, and that all environmental impacts be addressed

2. regarding methodology and scientific accuracy, that, ***"...They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and the sources relied upon for the conclusions in the statement".*** [ii]

129.18

The DEIS/DEIR does not indicate the detailed methodology used to develop the levels of passenger forecasts presented.

3. the environmental consequences regarding the following, ***"The discussion will include the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented. It shall include discussions of: ...(g) Urban quality, historic and cultural resources, and the design of the built environment...".*** [iii]

129.19

The DEIS/DEIR discusses the preferred alternatives effect on historic districts but does not comment on the urban quality, or the design of the built environment. Although Peak Hour Pricing in Alternate 1 clearly shows to be the most beneficial for delays and thus, noise reduction, the MPA continues not to consider this alternative except as a future option.

129.20

4 ***"An agency shall commence preparation of an environmental impact statement as close as possible to the time the agency is developing or is presented with a proposal (PP 1508.23) so that preparation can be completed in time for the final statement to be included in any recommendation or report on the proposal. The statement shall be prepared early enough so that it can serve practically as an important contribution to the decision making process and will not be used to rationalize or justify decisions already made." PP 1508.23 describes a proposal as the following: " 'Proposal' exists at the stage in the development of an action when an agency subject to the Act has a goal, is actively preparing to make a decision on one or more alternative means of accomplishing that goal, and the effect can be meaningfully evaluated."*** [iv]

129.21

The ENF Certificate was issued November 22, 1995. The MPA and the FAA have not complied with the required timing of the DEIS/DEIR document. Furthermore, the analysis uses baseline

data of 1993 for a document submitted in 1999. Weather, as well as aircraft and major regional infrastructure and have occurred to the point where a 1998 base year should be required. 129.22

A lack of "reasonable alternatives" exists because of the lack of an assessment of the entire Northeast regional transportation system, the documentation of the history of PRAS and the problems of implementation. The surrounding communities cannot continue to absorb the landside growth that would accompany the proposed airside growth at the airport. 129.23 129.24

There should be a detailed analysis of the causes of the delays in the document which show aircraft mechanical problems, crew caused delay, and weather causes both at Logan and those caused by weather at other airports. This analysis is outdated and inadequate. 129.25

Lowering of the minimum on runway 22L is an additional concern of the Sierra Club for the near in neighborhood of the Saratoga Street area of East Boston. Not only does this allow for an increased number of flights to land at Logan Airport, it also will spread the noise from the missed approach aircraft more horizontally thus impacting the neighborhood at the end of runway 22L with increased noise. Further computer modeling does not present the real life occurrence in the surrounding communities and a more accurate analysis needs to be done. Communities constantly challenge the 65 db contour lines with regards to soundproofing which does not include air conditioning and which requires that the residence meet current code guidelines. That can cause financial stress on the already noise impacted residents. 129.26

The proposed centerfield taxiway between runways 4L/22R and 4R/22L leads to further increased operations at Logan Airport and increased noise for the close in residents of Winthrop, Revere, and East Boston. This taxiway will allow for additional queuing of aircraft very close to the surrounding neighborhoods and Constitution Beach, increased operations which will increase noise and further degrade the quality of life for these residents. 129.27

Boston as an historic city will suffer the brunt of negative impacts from the proposed Project and will lose a quality of life that will never be recaptured! The additional number of flights, as well as increased traffic, that the Project would allow and encourage will do irreparable harm to the historic city of Boston and the greater metropolitan area. Development of high speed rail connections to other airports and the connection of Boston's two rail stations with the North/South Rail Link could help reduce these impacts. Convention locations and tourist destinations are not determined by the accessibility of an airport, rather they are determined by the quality of the experience of the location. No other major city around the world has had loss of tourists or conventions because of the convenience or inconvenience of the locality's airport. For the MPA to claim that the additional runway and centerfield taxiway are needed for the proposed new convention center is nothing more than an exaggeration. Time and again the MPA has claimed the need for the Project for the good of the city of Boston. With the proposed growth for Logan Airport needless adverse impacts will continue to grow over one of the most historic cities in the country. Mayor Menino does not agree with the MPA hypothesis and neither does the Sierra Club. 129.28 129.29 129.30

Massport and the FAA both state ***"when dealing with an existing airport (such as Logan Airport) within an urban setting (such as metropolitan Boston), any change in operating conditions aimed at more equitably distributing noise impacts (here, in accordance with the PRAS goals) may result in some increase in noise at specific historic areas while at the same time decreasing noise at other historic areas."*** [v]

The Sierra Club believes that changes to Logan's operating conditions are not any more important than the cultural, historical and urban quality of life in the metropolitan Boston area.

The state listed endangered upland sandpiper habitat which would be disrupted by the enterfield taxiway is not adequately addressed and there is no agreement with the Massachusetts Natural 129.31

Heritage and Endangered Species Program although this has been a known area of concern since 1993.

A primary concern for the newly created Boston Harbor Islands National Recreation Area is the proposed construction of runway 14/32 and the resultant 75,000 proposed flights over the newly created Boston Harbor Recreational Area. This impact, one of environmental injustice, would occur to mostly inner city residents who frequent the islands to get away from the noise and hubbub of city life. This is, and should continue to be, a time for them to experience nature, to hear and smell the harbor and study the skies. These sensory experiences would be severely impacted by the exorbitant number of flights over the harbor. 129.32

Children from school groups, Boy and Girl Scout troops, Inner City Outings groups, and many other groups camp and explore the islands and enjoy learning experiences from the skies to the flora and fauna of the islands to the marine life and water quality. All of this will be degraded by the subject project.

The roar of the overhead planes will make a camping experience a horror rather than the wonderful enjoyment of sleeping under the stars. The fuel emissions and dumping from the airplane engines will contaminate the islands and the wildlife, not to mention the humans who will be much more exposed by being out of doors rather than at home or work.

In conclusion, ***The Sierra Club sees this proposed Project as the first step in further major development at Logan airport***, sees a lack of guarantee of the unidirectional use of the proposed 14/32 runway, and believes the lack of future plans and analysis for the airport over the next 20 years must be found and the current document declared inadequate. In addition, ***the public has not been given fair consideration of the proposed Project.*** It is merely an interim solution to a much bigger and more complex problem which must be addressed before allowing the project to go forward. In addition the projected growth of jet operations is horrifying. Other alternatives must be assessed. 129.33

Because none of these impacts has been adequately addressed or, in some cases, even mentioned in the DEIS/DEIR, the Sierra Club requests that the Secretary of Environmental Affairs (the Secretary) and the FAA determine that significant planning deficiencies exist in the DEIS/DEIR of the Logan Airside Improvements Planning Project ("Project") that must be addressed, that the document be found **"INADEQUATE"** and that a new Draft document be required 129.34

Thank you for this opportunity to comment.

John F. Deacon, Chair
Greater Boston Group

cc: John Devillars, Director, Regional EPA
Robert Bartonowicy, Regional Director, FAA

---

[i] Council on Environmental Quality, 40 CFR Part 1502.14(a)

[ii] Council on Environmental Quality, 40 CFR Part 1502.24

[iii] Council on Environmental Quality, 40 CFR Part 1502.16

[iv] Council on Environmental Quality, 40 CFR Part 1502.5

[v] DEIS/DEIS Section 8.6.1.2 "Assessment of Impact"

Letter 129
Massachusetts Sierra Club
John F. Deacon, Chair, Greater Boston Group

Code	Topic 1	Topic 2	Comment	Response
129.1	Environmental Review Process	FAA/NEPA, MEPA	The Massachusetts Chapter of the Sierra Club...requests the Secretary of Environmental Affairs (the Secretary) and the FAA determine that significant planning deficiencies exist in the DEIS/DEIR of the Logan Airside Improvements Planning Project ("Project") that must be addressed; that the document be found "INADEQUATE", and that a new Draft document be required.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.
129.2	Alternatives	Preferred Alternative	Each of the major three parts: the proposed runway 14/32, the centerfield taxiway between the 4/22 runways, and the lowering of the minimum have major environmental impacts for the greater Boston metropolitan area which have not been adequately addressed.	Refer to response to comment 129.1.
129.3	Analysis Assumptions/ Methodologies	Base Year	...the data and studies used are outdated and a 1998 base year should be required with the planning period extended from 2010 to at least 2020.	The Supplemental DEIS/FEIR provides updated information for 1998—the latest year for which actual Logan Airport data are available. 1993 was adopted as the base year when the Airside Improvement studies commenced in 1994. The primary function of the Base Year analysis is to calibrate the airfield operation models and environmental impact models. The benefits and impacts of the action alternatives (Alternatives 1, 1A, 2 and 3) are assessed by comparing these not with the base year, but with Alternative 4, the No-Action Alternative. The planning scenarios for 37.5 and 45 million passengers represent a range of future activity at Logan Airport expected in the 2010 to 2020 time frame. Analysis of 1981 to 90 weather with 1989-98 weather identifies no significant differences in statistical properties.
129.4	Environmental Review Process	FAA/NEPA	The Club further wishes to go on record concerning...[there is a] conflict of interest...for the FAA to be a proponent for the Project and then also one of the decision makers in determining the Project's adequacy. We strongly request that the EPA take the lead role for any decision making because of this conflict.	Comment noted.

Code	Topic 1	Topic 2	Comment	Response
129.5	Regional Transportation	Regional Airports	A comprehensive Northeast regional transportation plan, including all forms of transportation, needs to be developed and subjected to public review before any further airport expansion is allowed.	Massport's analysis of regional alternatives is comprehens and reflects all the major recommendations of various regio planning studies that have been conducted over the last decade. These include expansion of the regional airports a development of high-speed rail in the Boston-New York ma
129.6	Analysis Assumptions/ Methodologies	Passenger Forecasts	The study area must include the Federal Aviation Administration's Eastern and New England regions with a goal of identifying and quantifying long range airside, landside and groundside demand requirements.	The proposed Logan Airport Airside Project is necessary and pro e clear benefits at current traffic levels. Massport has long recogniz that service development and increased passenger traffic at the regional airports are an important part of the region's long-term strategy to accommodate passenger and activity growt Massport has actively encouraged the development of regional airports and use of other options, especially high-speed rail to Logan Airport's largest market, New York. Section 2.3 of the Supplemental DEIS/FEIR evaluates T.F. Green/Providence, Manchester, and Worcester Regional air s and their potential impacts on Logan Airport. The regional airports expected to accommodate an increasing share of the overall grov in air travel demand within the greater Boston area. This will provi some relief to the growth pressures at Logan Airport but will not eliminate the need for airside projects.
129.7	Regional Transportation	Regional Airports	The scope for such a study should include, but not be limited to: ■ an inventory of all airports and associated planned regional airside and landside projects. ■ existing and planned rail passenger services (both Amtrak and commuter rail). ■ an inventory of underutilized railroad rights of way and potential uses. ■ an analysis of future high speed rail initiatives. ■ an inventory of the existing interstate highway system and any planned system expansion. ■ an analysis of regional air cargo demand. ■ a discussion of how airports with constrained landside expansion potential deal with airside capacity issues. ■ all environmental impacts on wetlands, waterways, flora, fauna, and human, including health studies as well as air, noise and odor impacts. ■ potential for future reduction in peak time business trips due to improvements in teleconferencing. ■ The implications on regional airside planning of NLA's (New Large Aircraft) - more later. ■ The implications on regional groundside planning of the construction of the North/South Rail Link.	The discussion of alternatives in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR responds t federal and state scoping directives and provides appropriat analytical context for assessing the need for the Preferred Alternative.

Code	Topic 1	Topic 2	Comment	Response
129.8	Regional Transportation	Passenger Rail	The North/South Rail Link must be a integral part of the planning process for Logan or any other regional airport expansion projects.	Massport has actively encouraged regional transportation alternatives to Logan Airport, including rail. Massport supports intercity rail planning through its membership in the Boston Metropolitan Planning Organization (MPO). The MPO is a cooperative planning board whose membership also includes MassHighway, Metropolitan Area Planning Council; MBTA, and MBTA Advisory Board. As members of the MPO, Massport and these agencies are responsible for preparing the *Boston Transportation Improvement Program (TIP)* and the *Transportation Plan for the Boston Region.* In this capacity, Massport influences regional transportation plans for intercity rail. Massport also holds a seat on the Citizens Advisory Committee (CAC) of the MBTA's North-South Rail Link Project. The CAC met monthly and provided a forum for Massport and the MBTA to coordinate their ridership estimates and assessments of the relationship of the North-South Rail Link on airport access and airport usage. To date, the North-South Rail Link Project has not received funding and will not impact Logan Airport over the study time frame. Should the North-South Rail Link be constructed, resulting passenger diversions from Logan Airport to rail could reach 46,700 annual passengers, or less than one-half of one percent of Logan Airport's total annual traffic.
129.9	Analysis Assumptions/ Methodologies	Passenger Forecasts	Members of the Rail Link CAC have serious concerns with the intercity (Amtrak) numbers for trips originating and terminating north of Boston, as well as potential diversions from airside demand. The Club feels that the low estimates for Rail Link airside Logan diversions have more to do with artificial constraints, primarily parking supply, than with actual Northeast Corridor ridership....	The analysis of regional alternatives presented in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR relies on air to high-speed rail diversion estimates published in the Supplemental DEIS/FEIR and Section 4(f) Statement, Northeast Corridor Improvement Project, prepared by the Federal Rail Administration in October 1994. In preparing the Supplemental DEIS/FEIR, Massport contacted Amtrak for more recent estimates, but Amtrak did not have any updated ridership estimates that could be released to Massport. Amtrak's written response to Massport's request for updated ridership numbers is contained in Appendix B of the Supplemental DEIS/FEIR. See Appendix B for the latest status of the North-South Rail Link diversion estimates.
129.10	Regional Transportation	Passenger Rail	In any case, Massport's DEIS/DEIR should be withdrawn pending the completion of the Rail Link MIS/DEIS/DEIR, and the incorporation of its findings into a regional transportation study.	Refer to response to Comment 129.9.
129.11	Analysis Assumptions/ Methodologies	Fleet Mix	The impact of New Large Aircraft (NLA) must be quantified as to their impacts on Logan and other regional airports.	So-called New Large Aircraft (NLA) carrying up to 1,000 passengers are still just in the discussion phase. No manufacturer has undertaken serious development of such aircraft yet, which would be a multi-year process. These aircraft would probably require modifications to existing airport jetways and apron areas along with increases in taxiway width and turning area. Their use would be limited to extremely high-density markets, and it is not likely that Boston would be among these. In fact, the number of "jumbo jets" serving Logan Airport has declined in recent years. Consequently, the NLA was not included in the Future Fleet scenarios.
129.12	Alternatives	Runway 14/32	It is important to ask Massport to describe what plans, if any, have been made to address the impacts of NLAs. And if such an effort is ongoing, the result is segmentation of the EIS/EIR process which is not legal, especially when the runway 14/32 project would be a small part of an EIS/EIR looking at Logan expansion as a whole.	Refer to response to Comment 129.11.
129.13	Regional Transportation	Passenger Rail	The reopening of a discussion regarding the construction of a second major airport is counterproductive at this time and would preclude the discipline necessary for any true analysis of transportation alternatives.	Comment noted.

Code	Topic 1	Topic 2	Comment	Response
129.14	Analysis Assumptions/ Methodologies	Planning Period	FAA delay data (DELAYSIM) shows that Logan's delay situation has improved since 1993 and is essentially in equilibrium. The entire analysis in the document needs to be updated.	Section 1.4 and Appendix C of this Supplemental DEIS/FEIR contains a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports. The delay situation is not at equilibrium. FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. Arrival delays, which would be directly affected b Runway 14/32, have risen steadily since 1994. In fact, Logan Airport is the second most delayed airport in the natio for arrivals.
129.15	Analysis Assumptions/ Methodologies	Base Year	The Sierra Club urges the Secretary and FAA to require the MPA to change the base year for planning for the project to calendar year 1998; to revise all presentations in the DEIS/DEIR including the appendices thereto, to reflect the changes; to extend the planning period to 2020 from 2010 with concomitant revisions in project levels of activity and impact and to require that the DEIS/DEIR be republished.	The projections of future airfield delays at Logan Airport are r based on analysis and modeling of delays which occurred dunng 1993. The analysis for 1993 was included in the Airsid Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibratic The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Current traffic trends at Logan Airport and the regional airport indicate that Logan Airport may not reach 29 million passengers, presented in the Airside Project Draft EIS/EIR as "1999" projection, until 2003. Continued air service expansion at the regional airports and the introduction of high-speed rail New York in December 2000 is expected to further slow Loga Airport's passenger traffic growth. With these developments, Logan Airport is expected to reach 37.5 million passengers in 2015 rather than 2010, and the 45 million passenger forecasts will not be achieved until 2024. Thus, the planning forecasts that underlie the delays and environmental analyses cover a planning period of at least 20 years. Refer to Section 4.2 of th Supplemental DEIS/FEIR for a complete discussion of the planning forecasts.
129.16	Environmental Review Process	NEPA	Massport has not met the requirements of the National Environmental Policy Act (40 CFR Part 1502 Environmental Impact Statements) which requires...the DEIS/DEI[R] to "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated".	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EI to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members o the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.

Code	Topic 1	Topic 2	Comment	Response
129.17	Alternatives	Other Non-Construction Alternatives	...the DEIS/DEIR alternatives...[should] include, but not be limited to, the following: ■ Consideration of Implementing a High-Density Rule (Slots). ■ Consider Implementation of FAR Part 161 regulations to provide aircraft noise and access restrictions for Stage 2 and Stage 3 operations at Logan in order to provide noise relief to affected communities. ■ Thorough regional transportation planning, including rail, and that all environmental impacts be addressed.	Neither federal nor state scoping directives required an analysis of slotting. Imposition of slot controls constitutes a federal policy that has been preempted to the FAA under federal law and is not within Massport's jurisdiction. Congress determined that the slot program has a number of significant problems. The U.S. DOT has studied options for reducing slot controls at airports. As a result, the AIR-21 Act, which was enacted in March 2000, eliminates all slots at three of the nations slot controlled airports. Slots at the Chicago O'Hare airport will be eliminated by July 1, 2002 and slots at New York LaGuardia and New York JFK will be eliminated by January 1, 2007. PPP represents a market approach that should encourage the highest value services to use Logan Airport during periods of scarce capacity without the market disruption and other inefficiencies related to slot control. The phaseout of Stage 2 aircraft operations was complete as of December 31, 1999. Refer to response to Comment 85.26. Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of options to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of options to Logan Airport. In the Airside Project Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts may not be achieved until after 2020. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.
129.18	Analysis Assumptions/ Methodologies	Passenger Forecasts	The DEIS/DEIR does not indicate the detailed methodology used to develop the levels of passenger forecasts presented.	The 29 M level was developed in the *Logan Airside Improvements Feasibility Study*. It represented the growth from 1993 level at the historic (1960 to 1993) average growth rate of approximately three percent annually. The 37.5 M and 45 M levels have been used historically in other planning studies at Logan Airport and represent estimates of future demand under constrained and unconstrained growth scenarios. More information can be found in *Passenger Forecast for Logan International Airport*, Massport, 1991 and in *Logan Airside Improvements Feasibility Study_Phase 1 Report*, Massport, July 1995.

Code	Topic 1	Topic 2	Comment	Response
129.19	Open Space/ Parkland	Impacts	The DEIS/DEIR discusses the preferred alternatives effect on historic districts but does not comment on the urban quality, or the design of the built environment.	The proposed projects evaluated under each of the alternati are located on the existing airfield. Implementation of any of proposed projects will not physically change the urban characteristics or the design of the built environment within adjacent communities when compared to the No-Action Alternative. Off-airport noise impacts from the Preferred Alternative are discussed in Section 6.2 of the Supplemental DEIS/FEIR.
129.20	Alternatives	Peak Period Pricing	Although Peak Hour Pricing in Alternate 1 clearly shows to be the most beneficial for delays and thus, noise reduction, the MPA continues not to consider this alternative except as a future option.	See Section 4.5 of the Supplemental DEIS/FEIR.
129.21	Environmental Review Process	FAA/NEPA, MEPA	The MPA and the FAA have not complied with the required timing of the DEIS/DEIR document.	Massport and FAA have complied with all applicable state an federal requirements.
129.22	Analysis Assumptions/ Methodologies	Base Year	...a 1998 base year should be required.	Refer to response to Comment 129.15.
129.23	Environmental Review Process	NEPA	A lack of "reasonable alternatives" exists because of the lack of an assessment of the entire Northeast regional transportation system, the documentation of the history of PRAS and the problems of implementation.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's *Logar Capacity Enhancement Plan* (October 1992); the *Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study* (December 1993); the *Logan Final GEIR* (July 1993); and the *Logan Airside Improvements Feasibility Study, Phase 1 Repo* published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its *Boston Logan International Airport Capacity Enhancement Plan*. The FAA recommended several improvement concepts, including unidirectional Runway 14/32 for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the *Logan Airside Feasibility Study*, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIF The altematives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.

Code	Topic 1	Topic 2	Comment	Response
129.24	Cumulative Impacts	Landside Improvements	The surrounding communities cannot continue to absorb the landside growth that would accompany the proposed airside growth at the airport.	The Airside Project has independent utility from existing and proposed landside projects at Logan Airport. The proposed improvements analyzed in the Supplemental DEIS/FEIR involve both construction and administrative actions that will facilitate aircraft operations (landings, takeoffs and taxiing). None of the improvements involve landside facility improvements (*e.g.*, terminals and roadways) or related operations. The Supplemental DEIS/FEIR analyzes in detail the impacts from aircraft operations, including analysis of noise and air quality impacts during the years 1993, 1998 and under future forecast scenarios as well as environmental benefits from certain of the improvement concepts under review. In this respect, the Supplemental DEIS/FEIR conforms with scoping directives from the lead federal agency (the FAA) and with applicable FAA environmental orders, all issued in accordance with NEPA, and with directives from EOEA issued under MEPA. The various GEIR documents, including the *Logan Airport 1998 Annual Update* and the *1999 Environmental Status and Progress Report* (previously GEIR), provide additional analytic context by examining cumulative impacts from airside (*i.e.*, aircraft) operations and landside (*e.g.*, vehicular traffic, terminal service vehicles) operations at Logan Airport as well as Massport's comprehensive mitigation program. The ESPR/GEIR is specifically incorporated by reference in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR as a background document. Each GEIR/ESPR submission is subject to public review and comment. The *Logan Airport 1998 Annual Update* and the *1999 ESPR* analysis is based on the same forecast levels used in the Supplemental DEIS/FEIR. The GEIR/ESPR informs Massport's planning process for all the improvements at Logan Airport, including the improvements under review in the Supplemental DEIS/FEIR. Consistent with past practice, Massport expects that the FAA will take the GEIR/ESPR analysis into account during its deliberations and ultimate decision on the Supplemental DEIS/FEIR.
129.25	Delay	Model	There should be a detailed analysis of the causes of the delays in the document which show aircraft mechanical problems, crew caused delay, and weather causes both at Logan and those caused by weather at other airports.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. The Airside Project addresses delays from constraints at Logan Airport. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a detailed discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport delays within the context of delays at other United States airports.
129.26	Alternatives	Reduced Approach Minima	Lowering of the minimum on runway 22L [will cause increased noise]...the near in neighborhood of...Saratoga Street area of East Boston.	Reducing the current landing minimums for Runways 15R, 22L, and 27 at Logan Airport will not increase noise levels. Aircraft will follow the same arrival paths, at the same altitudes as today, but the location at which a missed approach decision must be made will be moved closer to the airport. Since missed approaches rarely occur, they have no discernible effect on the cumulative noise. For example, reducing the Runway 22L decision height to 200 feet moves the maximum noise point to approximately 3,000 feet from touchdown which is further from populated areas in East Boston than the current maximum noise point. Although categorically excluded from NEPA review, modeling of the changes in runway availability from reductions in the approach minimums and an analysis of the potential impacts on community noise exposure that may result were included in the Airside Project in compliance with an earlier agreement among Massport, the FAA and the City of Boston.

Code	Topic 1	Topic 2	Comment	Response
129.27	Alternatives	Taxiway Improvements	The proposed centerfield taxiway between runways 4L/22R and 4R/22L...will increase noise and further degrade the quality of life for [residents of Winthrop, Revere, and East Boston]....	Section 6.2 of the Supplemental DEIS/FEIR shows that ther are small noise benefits from the construction of the Centerfield Taxiway. The principal effect of the Centerfield Taxiway is to reduce the number of aircraft waitir on the taxiways reducing ground noise and emissions for clc in residents of East Boston and Winthrop. It also should eliminate aircraft landing on Runway 4R from waiting to cros Runway 4L and aiming their intake noise toward Constitution Beach. Section 6.4 of the Supplemental DEIS/FE discusses the air quality benefits of the Centerfield Taxiway.
129.28	Open Space/ Parkland	Impacts	Boston as a historic city will suffer the brunt of negative impacts from the proposed Project....	The FAA and Massport have consulted with the Massachuse Historical Commission (MHC). The MHC has concurred with the FAA's determination that the Preferred Alternative will ha no adverse effect on significant historic properties. Refer to Section 6.3.2 of the Supplemental DEIS/FEIR for a descriptic of historic properties, project impacts and mitigation.
129.29	Regional Transportation	Passenger Rail	Development of high speed rail connections to other airports and the connection of Boston's two rail stations with the North/South Rail Link could help reduce these impacts.	Massport advocates increased use of the regional airports ar high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as development at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.
129.30	Ground Transportation	Access to Logan	[The convenience level of a city's airport has no effect on tourism or convention business.]	The delay analysis presented in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR clearly indicates that delays will increase in the future if Runway 14/3 is not built. Section 1.2 of the Airside Project Draft EIS/EIR an Section 1.3 of the Supplemental DEIS/FEIR discuss the importance of Logan Airport to the regional economy. Refer also to Section 4.6 of the Supplemental DEIS/FEIR for a discussion of the delays that would occur under future scenarios if no actions were taken, and the delay reduction benefits of the Preferred Alternative.
129.31	Ecosystem	Rare Species	The state listed endangered upland sandpiper habitat which would be disrupted by the centerfield taxiway is not adequately addressed and there is no agreement with the Massachusetts Natural Heritage and Endangered Species Program....	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport from construction of the Centerfield Taxiway. Th plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far exceeding the ±40 acres to be lost at Logan Airport. In the event that such a program at Camp Edwards is not available, an appropriate alternative program acceptable to the NHESP will be developed and implemented. Additional details of the Upland Sandpiper mitigation plan are presented in Section 6.5 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
129.32	Alternatives	Runway 14/32	[The proposed new runway will have a very adverse impact on the Boston Harbor Islands National Recreation Area including increased noise, scenic, water quality, and wildlife impacts.]	The Boston Harbor Islands, while within the No Action Alternative (Alternative 4) 65 dB Day-Night Sound Level (dB DNL) contour, will have no noise increase with the Preferred Alternative. Refer to Section 6.3.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative.
129.33	Environmental Review Process	Public Process	...the lack of future plans and analysis for the airport over the next 20 years must be found and the current document declared inadequate. In addition, the public has not been given fair consideration of the proposed Project. It is merely an interim solution to a much bigger and more complex problem which must be addressed before allowing the project to go forward.	Current traffic trends at Logan Airport and the regional airports indicate that Logan Airport may not reach 29 million passengers, presented in the Airside Project Draft EIS/EIR as a "1999" projection, until 2003. Continued air service expansion at the regional airports and the introduction of high-speed rail to New York in December 2000 is expected to further slow Logan Airport's passenger traffic growth. With these developments, Logan Airport is expected to reach 37.5 million passengers in 2015 rather than 2010, and the 45 million passenger forecasts will not be achieved until 2024. Thus, the planning forecasts that underlie the delays and environmental analyses cover a planning period of at least 20 years. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a complete discussion of the planning forecasts. There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.
129.34	Environmental Review Process	MEPA	Because...impacts ...[have not] been adequately addressed....the documents [should] be found "INADEQUATE" and ...a new Draft document [should] be required.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.

LETTER 130

BRIEFING REPORT

State of the State: The Need for Logan Airport Improvements

EXECUTIVE SUMMARY

Improvements at Logan Airport Badly Needed. With an annual economic impact of $5 billion, Boston Logan International Airport is at the heart of the region's economy. But in 1998, Logan experienced more than 120,000 hours of delay, making it the sixth-worst airport for delays in the nation. The annual cost of those delays to airlines and passengers? An estimated $310 million.

Surprising Reason for Logan Delays: Wind. The layout of Logan's four major runways means that when strong winds blow from the northwest, only one or two of the existing runways can be used. The normal of capacity 120 takeoffs and landings per hour drops to 90 or even 60, causing huge traffic delays.

New Over-Water Runway Is the Key to Improvement. Massport has proposed a series of airside improvements to reduce delay and improve efficiency on Logan's airfield. The centerpiece would be a new 5,000-foot commuter aircraft runway with all arrivals and departures occurring over water. The new runway would reduce delays up to 90 percent on northwest wind days, by more than 50 percent on good weather days, and by up to 25 percent annually.

Other Airports Can Help But Not Enough. Passenger growth in 1998 was up 75 percent at Manchester Airport and 14 percent at T.F. Green Airport (R.I.), making them two of the fastest growing regional airports in the country. Hanscom Field already is the second largest New England airport in landings and takeoffs. This growth helps to siphon off some of Logan's congestion but is not enough to make a serious dent in Logan's delays.

Public Overwhelmingly Favors Airport Improvements. 70 percent of citizens statewide consider Logan Airport very important to the region's well being, and 88 percent of the public favors a program to modernize Logan. 62 percent of Massachusetts residents and 52 percent of those in Boston support the new runway construction, specifically.

Logan Upgrade Helps Residents and Job Growth. A more efficient and hassle-free Logan made possible by airside improvements will support business expansion and job growth, the new convention center and Boston's Seaport District. At the same time, the new runway will spread noise impacts more equitably across communities near the airport and shift 75,000 flights over water—and that benefits everyone. The new runway also will improve quality by reducing aircraft queuing, idling and circling overhead.

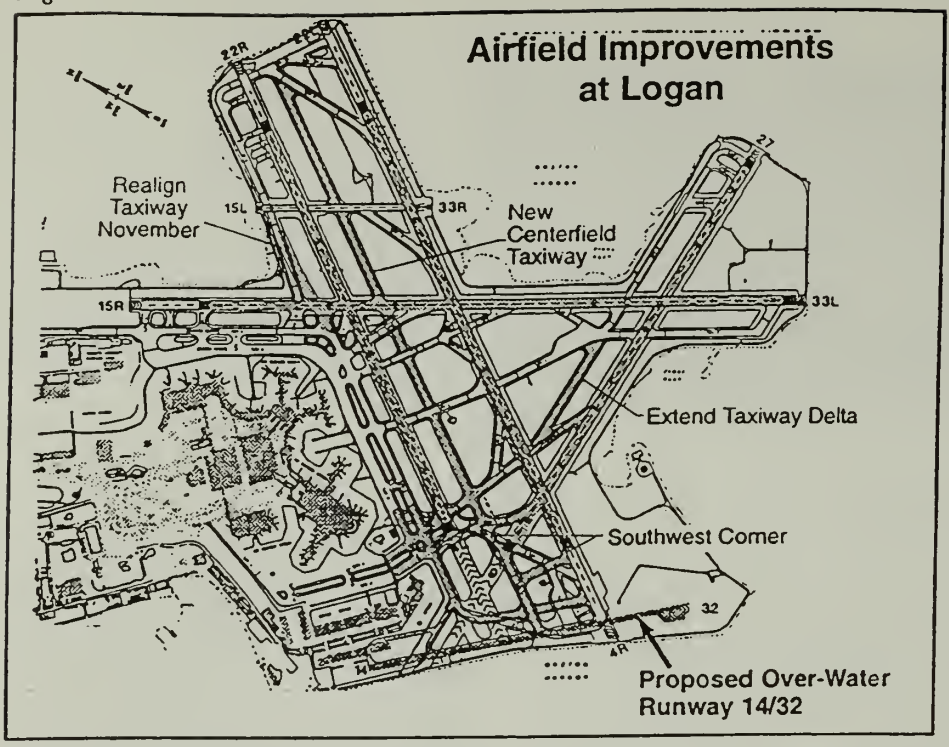
A Corporate Client Report
Vol. 10, No. 1 March 1999

On February 24, Boston Edison was pleased to host Mass Insight's annual winter review of the state's public policy agenda, with a special focus on the proposed new runway at Logan Airport. This briefing report summarizes the Logan Airport issues and includes highlights of the Mass Insight winter public opinion research on Logan and other public priorities.

At the briefing, **Betty Desrosiers**, director of aviation planning and development for Massport, presented the new runway project at Logan Airport. **Mark Robinson**, chairman of Massport, and **Gloria Larson**, chairman of the Mass. Convention Center Authority, emphasized the critical importance of the project for the state. Business initiatives to generate support were outlined by **Alan Macdonald**, executive director of the Massachusetts Business Roundtable, **Brian Gilmore**, executive vice president of Associated Industries of Massachusetts, and **James Klocke**, director of government affairs and economic development for the Greater Boston Chamber of Commerce.

As chair of the Mass. Business Roundtable's Transportation Committee, I know that improving Logan is one of the most important infrastructure projects under discussion now. Public opinion favors the effort, but it will be critical for business, state and local leaders to speak out at upcoming public forums on the issue, including NEPA/MEPA hearings on April 7 at 6:30 PM at the State Transportation Building in Boston and on April 8 at 6:30 PM at the Holiday Inn, Route 1A North in East Boston.

Thomas May
CEO, Boston Edison



THE ISSUE: LOGAN AIRFIELD LAYOUT LEADS TO POOR SERVICE—AND THE PUBLIC SUFFERS

Delays at Logan Are Five Times the Congestion Minimum and Costly. Logan's 120,000 hours of delay in 1998 were at five times the FAA threshold for congestion. Delays cost Massachusetts businesses, passengers, and airlines more than $300 million annually. High-growth industries in particular depend on Logan—business, management and financial services, high tech and communications. 78 percent of local businesses expect their demand for air travel to increase over the next five years.

Wind and Airfield Layout the Culprits. Logan has four major runways. The FAA tower uses three runways at a time to accommodate 120 takeoffs and landings per hour. Under these conditions, demand can be accommodated with little delays. But when strong winds come from the northwest, one or two of the runways become unusable, making operations plunge to between 60-90 per hour. Even when the weather is clear, airplanes at Logan can end up taking off late, and planes in other airports embarking for Boston remain grounded.

The Public Sees Logan as Non-Competitive. 43 percent of Massachusetts residents feel that Logan Airport is worse than other airports, 27 percent feel it is better, and 14 percent believe it is about the same as other airports. Among airport users, negative ratings jump. 53 percent of people using Logan one to five times in the last year say it is worse than other airports.

Delays Create More Noise for Logan's Neighbors. Residents in communities surrounding the airport suffer from delays. Late daytime schedules mean planes continue operations later at night. The lack of a third east-west runway forces the FAA to rely heavily on Logan's north-south oriented runways, significantly impacting communities to the north and south. This also limits how often planes can takeoff and land over the water.

LOGAN IMPROVEMENT IS CRITICAL TO THE REGION'S COMPETITIVE ADVANTAGE

Job Growth Hinges on Improvements. Boston-area businesses surveyed said that dependable and frequent air service is the second-most important factor when considering where to locate a business. A delay-prone airport alienates executives considering Massachusetts as a home base and undermines Boston's new convention center and Seaport District. No significant improvements have been made to Logan's airfield in more than 25 years. Other major U.S. cities are investing in new runways to enhance their airports; Boston must do the same to remain competitive.

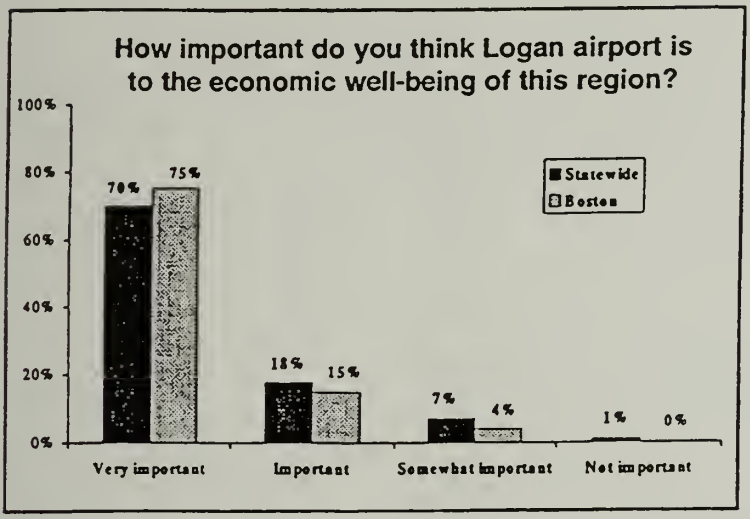
Logan Airport Creates Jobs and Revenue Directly. Logan supports more than 100 airport-related businesses and provides jobs for more than 15,000 employees. Airport payroll, local purchases, and taxes translate to $1.4 billion, while visitor expenditures, travel commissions and related revenue generate another $3.6 billion.

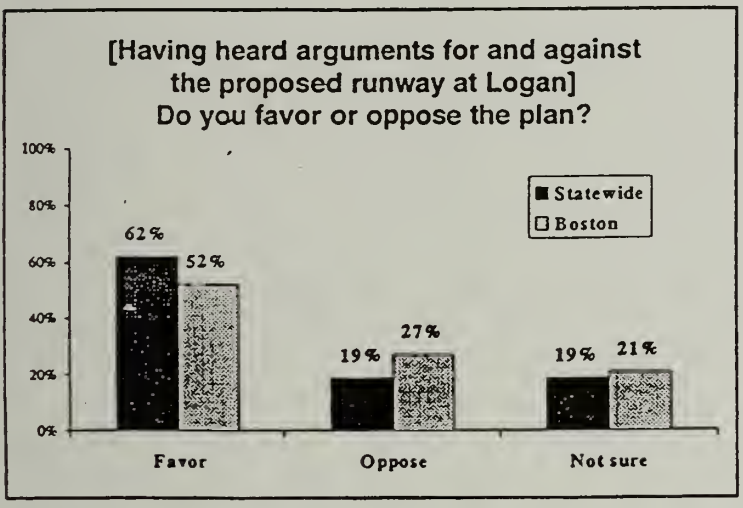
Public Sees Logan's Importance to Residents and Businesses. More than half (56 percent) of Massachusetts residents have used Logan airport in the past year. 86 percent of the public consider the airport to be important to the economic well being of the region; the number is even higher in Boston. One-third of state residents consider Logan to be important to their employers. In Boston, nearly half (47 percent) see the airport as important to their business.

OVER-WATER RUNWAY 14/32: THE KEY TO IMPROVEMENT

New Over-Water Runway Is the Critical Element. One of the key solutions Massport has proposed to increase

efficiency at Logan is the uni-directional over-the-water runway 14/32. The new runway 14/32 would reduce delays up to 50 percent on northwest wind days. Flights to Logan are expected to grow at about 1.5 percent annually. That's because Boston has a vibrant economy and is one of the most popular destinations for business and leisure travel in the U.S. Runway 14/32 will allow the FAA to better manage the traffic that is coming anyway and distribute flights more equitably over nearby neighborhoods, reducing persistent noise over any one community.





Other Airside Improvements Support the New Runway. Proposed improvements to Logan also include a centerfield taxiway, which would reduce taxiway congestion and ease movement of aircraft between terminal areas and runways. Proposed changes would also lower approach minimums—the point at which a pilot must decide whether to abort a landing—for Logan's runways. Reduced minimums will further ease delays, enhance safety and improve operational flexibility by giving air traffic controllers a choice of runways under poor weather conditions.

ALTERNATIVE SOLUTIONS ARE NOT ENOUGH

Relief Provided by Other Airports Necessary But Not Sufficient. Hanscom Field is already the second busiest New England airport in operations, serving the corporate market. Passenger growth in 1998 was up 75 percent at Manchester, N.H., Airport and 14 percent at T.F. Green (Providence) Airport, siphoning off some of Logan's congestion. Planned expansion at Worcester and New Bedford airports can help. However, Logan will remain the region's hub airport, and none of these developments will sufficiently decrease delays at Logan.

Peak-Period Pricing Doesn't Address the Problem. Pricing landing/takeoff fees higher at peak-travel times will not address weather-related delays, which are the principal cause of slowdowns at Logan. In addition, the costs to important regional carriers, such as Cape Air and Business Express, could be devastating.

PUBLIC SUPPORT, EVEN IN BOSTON, FOR THE PROJECT

Public Strongly Favors Modernization. 88 percent of the public favor a program to improve Logan. The public strongly supports the construction of a new runway: 62 percent are in favor, 19 percent oppose it, and 19 percent are unsure. Even in Boston, the majority (52 percent) are in support of a new runway, while 27 percent oppose it.

Gaining Momentum for the Project. Massport has filed the Environmental Impact Statement Report for the Logan Airside Improvements Planning Project, as it is called, to the appropriate state and federal agencies and hopes to have the project permitted by the end of 1999. In early 2000, Massport will seek relief from a 1975 court injunction, which was based on a petition filed by a community-based organization opposing construction of the new runway. Design and construction of the runway is planned for 2000-2001 and should be completed within a year. Other improvements will take an estimated three to five years to complete.

Public and Business Support Crucial. The support of business and community leaders is critical at public hearings and in the media. A partial list of hearings includes the NEPA/MEPA hearings on **April 7** at 6:30 PM at the State Transportation Building in Boston and on **April 8** at 6:30 PM at the Holiday Inn, Route 1A North in East Boston. The Greater Boston Chamber of Commerce is coordinating an effort involving the Mass. Business Roundtable, A.I.M. and other advocates.

Letter 130
Mass Insight, State of the State Executive Summary

Code	Topic 1	Topic 2	Comment	Response
130.1	General Support		State of the State: The Need for Logan Airport Improvements. Briefing Report in support of improvements at Logan Airport including the new runway.	Comment noted.

LETTER 131

MASSPIRG
Massachusetts Public Interest Research Group
29 Temple Place, Boston, MA 02111-1350 (617) 292-4800
http://www.pirg.org/masspirg

TO: Secretary Bob Durand
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

FR: Rob Sargent, Legislative Director

Date: April 23, 1999

Attn: MEPA Unit
Re: Logan Expansion/Runway 14/32

Dear Secretary Durand,

MASSPIRG urges you to reject the Massachusetts Port Authority's (MASSPORT) current Environmental Impact Statement (EIS) on their proposed runway expansion as insufficient. The EIS fails to adequately take into account existing pollution from the airport and the increased pollution from the planned expansion in light of their projected increases in passenger load. The EIS fails to specifically address past commitments that have been made to contain the environmental footprint of the airport. 131.1 131.2

You will hear from many commenters, well documented accounts of the level of current air, water and noise pollution. You will also receive many comments making an assailable argument that MASSPORT has neglected many factors which will contribute to increased pollution resulting from the airport expansion. Therefore, MASSPIRG will limit its comments to a number of conceptual considerations which must be taken into account before approving this EIS or any expansion at Logan Airport

Existing Burdens on the Environment and the Health of the Surrounding Communities

Logan Airport already poses an overwhelming air pollution burden on the communities surrounding it. It is directly responsible for very substantial emissions of smog-causing Nitrogen Oxides, hazardous air pollutants, including known and suspected carcinogens such as benzene and formaldehyde, and fine particulate pollution, a fine soot for which is increasingly known to be directly responsible for premature deaths. 131.3 131.4

Additionally, the airport is responsible for polluted runoff and other pollution of the surrounding harbor.

Past Assurances of No Net Increase in Environmental Impacts

MASSPORT has made statements in the past that it would not expand the "environmental footprint" of the airport. The EIS neglects to address these past commitments. The EIS states that the runway expansion will make the airport more efficient resulting in reduced congestion, idling and circling planes. Yet, it completely ignores the accompanying projections of growth in air traffic. The new runway must be considered in the context of the projected growth. In that light, the new runway can only be seen as an enabler to increased traffic in the absence of a commitment to cap air traffic at existing levels. 131.5 131.6

MASSPORT should not even consider a new runway without adopting policies which incent more efficient use of the runways. 131.7

Any increase in emissions and other environmental and health impacts must be offset by equivalent or greater reductions those impacts in the neighborhoods most directly affected by airport pollution. MEPA should reject any MASSPORT plan which does not contain clearly enforceable plans which adhere to this principle. 131.8

A Clear Accounting for Resources Committed For Past Environmental Mitigation Commitments

Consideration of the assumptions about and promises about future environmental impacts currently being made by MASSPORT cannot be done without a tough look at what has happened in past mitigation efforts.

Past mitigation commitments have included commitments continually increase the mix of passengers reaching the airport by public transit. Substantial resources were have been earmarked for this and other mitigation commitments. MEPA should demand a full accounting where those resources have been spent and where they intend to spend them in the future. 131.9

Flaws in State Transportation Planning

Lastly, the debate over the runway has fueled a much needed debate on transportation planning in the Commonwealth and in the region. This runway, nor any other changes in our tranportation infrastructure, should be considered with a comprehensive assessment of transportation options. 131.10

This must include a well thought out and coordinated regional plan including rail and a balanced use of the region's airports.

Letter 131
MASSPIRG
Rob Sargent, Legislative Director

Code	Topic 1	Topic 2	Comment	Response
131.1	Environmental Review Process	MEPA	The EIS fails to adequately take into account existing pollution from the airport and the increased pollution from the planned expansion in light of their projected increases in passenger load.	The air quality analysis includes all existing sources and future growth at Logan Airport.
131.2	Environmental Review Process	FAA/NEPA, MEPA	The EIS fails to specifically address past commitments that have been made to contain the environmental footprint of the airport.	Massport's airport-wide mitigation commitments are well documented and tracked in the Environmental Status and Planning Report and its annual updates. The Airside Improvements Planning Project proposed recommendations does not include the expansion of the footprint of Logan Airport. Extensive analysis of impacts of the 37.5 million scenario is discussed in detail in Chapters 5 and 6 of the Supplemental DEIS/FEIR.
131.3	Air Quality	Impacts	Logan Airport already poses an overwhelming air pollution burden on the communities surrounding it.	Modeling of air emissions shows no violation of the NAAQS in any areas surrounding Logan Airport.
131.4	Water Quality	Impacts	...the airport is responsible for polluted runoff and other pollution of the surrounding harbor.	Massport presents data regarding outfall monitoring in its GEIR/ESPRs and its subsequent Annual Updates. Similarly, Massport has developed extensive documentation regarding its development of the new salt marsh restoration area along Taxiway November. The Airside Project has been designed in a manner to avoid any wetland or harbor construction and a mitigation program has been developed to ensure that the project will not adversely affect water resources.
131.5	Environmental Review Process	FAA/NEPA, MEPA	Massport has made statements in the past that it would not expand the "environmental footprint" of the airport. The EIS neglects to address these past commitments.	See Response to 131.2. Extensive analysis of impacts of the 37.5 million scenario is discussed in detail in Chapters 5 and 6 of the Supplemental DEIS/FEIR. Extensive analysis of impacts of the 37.5 million scenario is discussed in detail in Chapters 5 and 6 of the Supplemental DEIS/FEIR.
131.6	Alternatives	Runway 14/32	...the new runway can only be seen as an enabler to increased traffic in the absence of a commitment to cap air traffic at existing levels.	The goals of the Airside Project are to reduce delay, increase the airport's efficiency, and improve airfield safety in an environmentally responsible manner. The construction of unidirectional Runway 14/32 would prevent the significant drop in airfield capacity that now occurs during northwest wind conditions. The runway would not increase Logan Airport's normal operating capacity of approximately 120 operations per hour which is available nearly 80 percent of the year, but rather would allow this capacity to be maintained more consistently.
131.7	Alternatives	Runway 14/32	Massport should not even consider a new runway without adopting policies which incent more efficient use of the runways.	The Preferred Alternative is a delay reduction program that promotes the efficiency and safety of airfield operations at Logan Airport. Runway 14/32 enhances operating efficiency by providing a third available runway in weather conditions that require northwest-southeast operations. Similar three-runway configurations exist for all other operating directions. Runway 14/32 would not expand the overall capacity of the airport, since Logan Airport's normal operating capacity of 120 operations per hour, which is available approximately 80 percent of the year, is maintained with Runway 14/32. Massport is committed to ensuring that the airfield continues to function as efficiently as possible. The Preferred Alternative achieves this goal responsibly.

Code	Topic 1	Topic 2	Comment	Response
131.8	Public Health	Effects	Any increase in emissions and other environmental and health impacts must be offset by equivalent or greater reductions [to] those impacts in the neighborhoods most directly affected by airport pollution.	The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative.
131.9	Ground Transportation	Access to Logan	Past mitigation commitments have included commitments [to] continually increase the mix of passengers reaching the airport by public transit. Substantial resources were [to] have been earmarked for this and other mitigation commitments. MEPA should demand a full accounting [of] where those resources have been spent and where they intend to spend them in the future.	The *Logan Airport 1999 ESPR* (previously GEIR) reports on Massport's progress on meeting its air passenger goal of 35.2 percent by the time air passenger volumes reach 37.5 million annual passengers. Consideration will be given ways to enhance transit ridership and use of the Logan Express bus service. In addition, Massport is considering consolidation of car rental facilities, which will facilitate the consolidation of the courtesy vehicles serving th rental car companies.
131.10	Regional Transportation	Regional Airports	...[The proposed new runway and] any other changes in our transportation infrastructure, should be considered with a comprehensive assessment of transportation options.	Massport's analysis of regional alternatives is comprehensiv and reflects all the major recommendations of various regional planning studies that have been conducted over the last decade. These include expansion of the regional airports and development of high-speed rail in the Boston-New York market.

MJ Research, Inc.

April 22, 1998

LETTER 132

Secretary of Environmental Affairs
attn: Arthur Pugsley -- EOEA #10458
100 Cambridge Street, 20th Floor
Boston, Mass. 02205

Re: New Runway at Logan Airport; Expansion at S. Weymouth & Hanscom

Dear Mr. Secretary:

I wish to offer some comments regarding the runway expansion at Logan Airport, as well as further observations regarding alternatives for expanded airport capacity in Eastern Massachusetts. This is a matter that is vital to the future of our company—as well as many other growing businesses in Eastern Massachusetts.

I write on behalf of MJ Research, Inc., which is a biotech manufacturing firm in Waltham. Our company employs about 250 people in a wide variety of disciplines, and we are a world leader in our area of DNA analysis technology. We have distributors in over forty nations, we have been two years an "Inc. 500" company, and we were recently honored with a "Business Excellence" award from the Greater Boston Chamber of Commerce. In short, I think we are the sort of business that Massachusetts wishes to develop (and keep).

PROBLEM FOR MASSACHUSETTS BUSINESS

A significant problem MJ Research frequently experiences is the slow (and exceedingly expensive) airline travel in and out of Boston. The biotech business requires that executives, scientists, service personnel, etc. frequently fly to other cities for one-day meetings or service calls, leaving in the morning and returning in the evening. But that is almost impossible to do in a reliable fashion from Logan Airport, because even on clear days, you will often find yourself sitting for two hours on the tarmac at Newark Airport, for example, waiting for a landing slot at Logan. This can be very imposing upon the time of the employees of MJ Research, diminishing our corporate efficiency and morale considerably. 132.1

PROBLEM REGARDING CONVENTION CENTER EXPANSION

This persistent "delay" problem is going to be exacerbated extraordinarily by the construction of a new convention center. We typically exhibit at 20+ conferences at such convention centers each year. Believe me, flying in an out of a convention city with 20,000 other attendees jams the airport in every convention city in the U.S. on the days that a major convention begins or ends (which typically composes three or four days in a week). Those individuals who advocate a vastly expanded convention business in Boston, while simultaneously opposing a runway expansion, are naïve at best. 132.2

NEED FOR NEW RUNWAY; SYPMPATHY FOR EAST BOSTON RESIDENTS

In the short term, I see no alternative but to open the proposed new runway at Logan Airport. It is the central airport of New England, and the fact is, the current runways are oversubscribed the instant a land breeze begins to blow towards Boston Harbor. We need a new runway at Logan, period.

But I am sympathetic to the concerns of the citizens of East Boston, Roxbury, Chelsea, Quincy and elsewhere, and I don't think these communities deserve to have every jet airplane flying in and out of Boston passing over their heads for the next fifty years. Rather, I wish to advocate in addition to the Logan expansion increased commercial service at Hanscom Field. But more importantly, I believe we should develop the old South Weymouth Naval Air Station as a new Boston airport.

Increased Commercial Service at Hanscom Field

As our company is located on Route 128 in Waltham, increased commercial service at Hanscom Field would be exceedingly convenient for us (as well as everyone else on Routes 128 and 2 and along the Interstate 93 corridor). Hanscom has the advantages of having existing highway approaches from both Routes 2A, 4 and 225—which should give adequate capacity for a moderate expansion. In particular, if there were simply increased commercial service to the New York, Chicago, and Washington D.C. airports, a large fraction of the highly-profitable business traffic could be diverted to this airport, without imposing excessively on the local citizens or the highway infrastructure. These three cities represent major hubs both nationally and internationally, and it would be greatly helpful to have Hanscom as a viable airport alternative for the Route 128 and the Metrowest crowd. 132.3

Former South Weymouth Naval Air Station

Perhaps the biggest unrealized opportunity for improving commercial air service in New England lies in the property that was once the South Weymouth Naval Air Station (NAS). This is an existing large airport, it has long runways capable of handling heavy jet traffic, and it has been used until quite recently for heavy military jet traffic (most of the approaches to the former NAS are over forest, highways or industrial buildings). Although the South Weymouth NAS Re-Use and Planning Committee has studied the matter for some time and has decided upon making the property into a shopping mall -- this old air base is potentially a resource of extraordinary value for ALL of New England. Thus I think its redevelopment should be more carefully considered, with the needs of the whole region in mind (and I hear the shopping mall plan is in trouble anyway).

The decisions being made today will affect all of New England for decades to come. It is inconceivable to me that more attention has not been given to the South Weymouth alternative, for this a unique opportunity to address fundamental problems with the New England infrastructure that are causing this ages-old Logan debate in the first place. The former NAS is well located on Routes 128 and Route 3, it would give good access to the South Shore and Cape Cod, and it is located along the new South Shore Commuter Rail Line. Furthermore, a short extension of the Red Line could easily bring MBTA subway service, which would conveniently connect a new airport to all of central Boston.

I have heard some argue that use of the old NAS as a commercial airport "interferes with Logan flight paths." As a licensed pilot of fifteen years experience, I simply don't understand this argument. The Navy's heavy use of this airport for decades didn't interfere—and military flight paths are typically considerable. Even if there were some limited interference—surely the flight paths of Logan could be adjusted to accommodate an airport a dozen miles away, if these same paths can be adjusted to accommodate a new Logan runway a quarter mile from existing runways.

Assembling property in the 1990's for a wholly new airport is a virtual impossibility—and the problem will only get worse in the twenty-first century. But in South Weymouth we have an existing large airport seemingly tailor-made for commercial use! A new Boston airport would provide long-term, high-quality local job opportunities for the residents of Weymouth, Rockland, Abington and Hingham (as well as the rest of the South Shore), while improving the air transportation opportunities for all of New England.

Thank you for taking the time to read my comments, and I look forward to your determination on the current proposal. It truly is a matter of significant concern for all of Massachusetts business.

Sincerely,

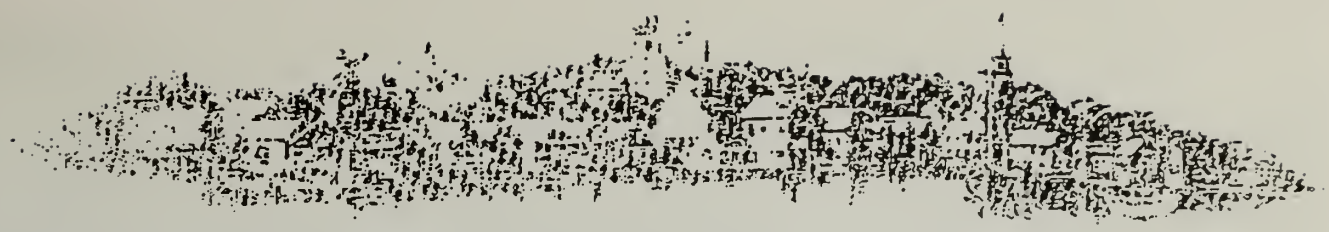
John Finney

JOHN FINNEY
President
MJ Research, Inc.

Enclosures

Letter 132
MJ Research, Inc.
John Finney, President

Code	Topic 1	Topic 2	Comment	Response
132.1	Purpose and Need	Delay	[Air service at Logan is unreliable due to delay problems.]	Comment noted.
132.2	Purpose and Need	Delay	[Logan needs to be efficient if Boston is to attract significant convention business.]	Comment noted.
132.3	Regional Transportation	Regional Airports	I...advocate in addition to the Logan expansion increased commercial service at Hanscom Field. But more importantly, I believe we should develop the old South Weymouth Naval Air Station as a new Boston airport.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field, consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.



Nantucket Island Chamber of Commerce
48 Main Street • Nantucket, Massachusetts 02554-3595 . 508-228-1700 . FAX: 508-325-4925

LETTER 133

April 7, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458
Cambridge Street
20th Floor
Boston, MA 02202

Dear Mr. Pugsley:

As an advocate for the business community on Nantucket Island, the Nantucket Island Chamber of Commerce wishes to make a statement regarding the proposed unidirectional runway at Logan airport.

Nantucket is geographically isolated, and relies more than most communities on safe and efficient air travel. Nantucket Memorial Airport is in the summer months New England's second-busiest airport, and on certain summer days has actually exceeded volumes seen at Logan. Air travel is a linchpin of our tourism economy, and since over 25 percent of our incoming commercial flights are vectored through Boston, the timeliness with which Logan Airport operates has a direct impact on our island. In addition, year-round residents of Nantucket rely upon air access to Boston for business, medical, and recreation needs, all of which can be fouled by delays.

The Chamber of Commerce also considers the new runway a better investment of Massport's resources than any of the stated alternatives, particularly reintroduction of a peak-period landing fee program. These programs are misguided and discriminatory, and punish the small airlines who contribute least to Logan's myriad delays. Studies have clearly shown the effectiveness of peak-pricing in delay reduction to be questionable at best. Furthermore, should a peak pricing structure be installed in Boston, it would have the potential to cripple Cape Air, the independent airline that provides our major link to Logan Airport, and the loss of which would do irrevocable damage to our island's economy. 133.1 133.2 133.3

The Chamber recognizes local concerns about noise; noise abatement has been a major issue on Nantucket as well. However, if the proposed runway is unidirectional, and remains unidirectional in perpetuity, then the impact of air operations will be minimized by overwater takeoffs and landings. Thank you for your consideration.

Sincerely,

Maia Gaillard
Executive Director

cc: Dan Wolf, President
Cape Air/Nantucket Airlines
Arthur Desrocher, Chairman
Nantucket Board of Selectmen
Fred Jaeger, Manager
Nantucket Memorial Airport

Letter 133
Nantucket Island Chamber of Commerce
Maia Gaillard, Executive Director

Code	Topic 1	Topic 2	Comment	Response
133.1	Alternatives	Runway 14/32	The Chamber of Commerce also considers the new runway a better investment of Massport's resources than any of the stated alternatives, particularly reintroduction of a peak-period landing fee program.	Comment noted.
133.2	Alternatives	Peak Period Pricing	...[Peak Period Pricing is] misguided and discriminatory, and punish[es] the small airlines who contribute least to Logan's myriad delays.	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.
133.3	Alternatives	Peak Period Pricing	...peak pricing...would have the potential to cripple Cape Air, the independent airline that provides our major link to Logan Airport, and the loss of which would do irrevocable damage to our island's economy.	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.



LETTER 134

April 19, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley – EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02202

Dear Mr. Pugsley:

The Nantucket Planning and Economic Development Commission ("NP&EDC") appreciates this opportunity to comment on the Draft Environmental Impact Report on the Logan Airside Improvements Planning Project, dated February, 1999.

The NP&EDC is the regional planning agency for the Island, Town, and County of Nantucket. As an Island, Nantucket faces unique transportation challenges. Nantucket is dependent on water and air transportation as critical links to the mainland. Among the most important transportation service are the air links between Nantucket and Boston's Logan Airport. The most consistent and frequent of which is provided by small carriers.

Peak Period Pricing

The NP&EDC understands that congestion of existing runways at Logan Airport is a serious concern, and threatens to erode the efficiency and margin of safety of airport operations. Among the options proposed by the DEIR is use of peak period pricing to control the demand at certain times. The NP&EDC is adamantly opposed to this method to reduce congestion. This air corridor is time-sensitive to Nantucket residents and businesses. The inevitable consequence of peak period pricing on Nantucket travelers and businesses is the absorption of additional transportation costs. Although the popular conception of Nantucket is a wealthy resort destination, this is not the reality. Businesses on Nantucket, as in any other place, must strike a balance between profit and overhead. Residents now pay over 30% more for transportation than their mainland counterparts. On Nantucket, transportation costs are already a substantial cost of living and doing business and there are escalating costs of land, rents and infrastructure. For those businesses that are forced to absorb the delays that are a consequence of peak period pricing, these delays equate to added cost for Nantucketers as well. There are virtually no reasonable alternative options available. Should peak period pricing force businesses to

134.1

134.2

abandon air service to Boston, other modes, or combination of modes of transportation must be used which are inefficient, and time consuming. Islanders frequently require connections to Boston for medical, professional, personal, governmental and other reasons.

Unidirectional Runway 14/32

The NP&EDC believes that the proposed Unidirectional Runway 14/32 is the best solution for improving congestion at Logan. Based on the information provided in the DEIR, this runway isolates much of the small carrier traffic from major carrier traffic, and by reducing this conflict, decreases delays. The improvements add no apparent costs to air carrier services and transportation costs between Nantucket and Logan, which is of course of critical importance to Nantucket. 134.3

In conclusion, the NP&EDC appreciates this opportunity to comment on this issue of serious economic impact to Nantucket. Nantucket as a thriving, historically preserved community is a substantial contributor to the economic well being of the Commonwealth, and this fact should not be lost as you assess the impacts of these various alternatives.

Very truly yours,

Alvin S. Topham
Chairman

Cc: Senator Henri Rauschenbach
Representative Eric Turkington
Massport
Arthur Desrocher, Chairman, Nantucket Board of Selectmen
Jennie Garneau, President, Nantucket Chamber of Commerce
Dan Wolf, President, Cape Air

File: Massport: Logan Airside Improvements

Letter 134
Nantucket Planning and Economic Development Commission
Alvin S. Topham, Chairman

Code	Topic 1	Topic 2	Comment	Response
134.1	Alternatives	Peak Period Pricing	The NP&EDC is adamantly opposed to...[peak period pricing] to reduce congestion.	The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR contain analysis of PPP as a demand management alternative at Logan Airport. See Section 4.5 of the Supplemental DEIS/FEIR.
134.2	Alternatives	Peak Period Pricing	[Implementation of peak period pricing at Logan would adversely affect Nantucket's economy.]	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.
134.3	Alternatives	Runway 14/32	The NP&EDC believes that the proposed Unidirectional Runway 14/32 is the best solution for improving congestion at Logan. Based on the information provided in the DEIR, this runway isolates much of the small carrier traffic from major carrier traffic and by reducing this conflict, decreases delays. The improvements add no apparent costs to air carrier services and transportation costs between Nantucket and Logan, which is...of critical importance to Nantucket.	The benefits of Runway 14/32 are significant: (1) It provides a third runway for operations during northwest winds; (2) it reduces total annual delay by 27 to 37 percent (Preferred Alternative vs. the No Action Alternative); (3) it reduces delays during VFR conditions by 47 to 57 percent (Preferred Alternative vs. the No Action Alternative); (4) it allows controllers to separate aircraft of differing size classes during northwest winds; and (5) it increases the controllers' ability to achieve PRAS goals.

Davis Companies
Equity Office Properties
Forest City Development
Hines
John Drew Company
Lend Lease Real Estate Investments, Inc.
The McCourt Company
Middlesex Mutual Building Trust
National Development of New England
New England Development
Nordblom Company
Simplex Time Recorder

SILVER GAVEL MEMBERS

Equity Industrial Partners
Fleet Bank
Goodwin, Procter & Hoar LLP
Hale & Dorr LLP
Holliday Fenoglio Fowler, L.P.
MGI Properties
Nutter, McClennen & Fish, LLP
Palmer & Dodge
Spaulding & Slye
TA Associates Realty
VHB, Inc.

1999 OFFICERS

President
Frank McCourt • *The McCourt Company*
Sr. Vice President-Chapter Affairs
Stephen Logan • *Nordblom Companies*
President Elect
Thomas Alpenn • *National Development of New England*
Vice President-Communications
Kathleen Joyce Kusiak • *Beacon Skanska Construction*
Vice President-Education
Bruce Freedman • *AMB Property Corporation*
Vice President-Membership
Robin Assaf • *Boston Private Bank*
Vice President-Programs
Sherry Clancy • *National Development of New England*
Assistant Vice President-Programs
Brian Levey • *Bowditch & Dewey, LLP*
Vice President-Public Affairs
Adam Weisenberg • *Goodwin, Procter & Hoar LLP*
Assistant Vice President-Public Affairs
Mike Wilcox • *Forest City Development*
Vice President-Special Events
Neil Schneider • *Leggat McCall Properties*
Vice President-Charitable Events
Thomas Collins • *Cushman & Wakefield*
Assistant Vice President-Charitable Events
Philip Brannigan, Jr. • *Berkeley Investments, Inc.*
Treasurer / Secretary
Chris Seyfarth • *E&Y Kenneth Leventhal R.E. Group*

BOARD OF DIRECTORS

Chairman: Steven Fessler • *Leggat McCall Properties*
Lisa Campoli • *Lynch, Murphy, Walsh & Partners*
Daniel DeMarco • *Campanelli Companies*
John Drew • *John Drew Company*
Thomas Dusel • *Middlesex Mutual Building Trust*
Robert Fishman • *Nutter, McClennen & Fish, LLP*
Gayle Friedland • *Forest City Development*
Michael Grill • *Fairlane Properties, Inc.*
C.J. Harwood • *GE Capital Investment Advisors*
Lewis Heafitz • *Equity Industrial Partners*
Ogden Hunnewell • *Nordic Properties*
James Karman • *Spaulding & Slye*
Christopher Maietta • *Combined Properties*
Michael Manzo • *Beal & Company, Inc.*
Frank McCourt • *The McCourt Company*
Pamela McDermott • *McDermott Ventures*
Stephen Murphy • *Quadrant Partners, LLC*
Peter Nordblom • *Nordblom Company*
Dana Rowan • *Exeter Realty Capital Partners*
Michael Ruane • *TA Associates Realty*
Ted Tye • *National Development of New England*
Frank Wuest • *AEW Capital Management LP*

Legislative Counsel
Richard Nylen, Jr. Esq. • *Lynch, DeSimone & Nylen*
617/348-4500

NAIOP OFFICE

617/965-0100
Executive Director
David Begelfer • *NAIOP*
Director of Member Services
Binnie Hundley • *NAIOP*

naiop
National Association of Industrial and Office Properties

Massachusetts Chapter

April 7, 1999

LETTER 135

Jay Wickersham, Director
MEPA
100 Cambridge Street
Boston, MA 02202

RE: LOGAN DELAY REDUCTION PROGRAM

Dear Mr. Wickersham:

NAIOP strongly supports Massport's Logan Delay Reduction Program in general and the cornerstone of this proposal, a new uni-directional runway. 135.1

Logan Airport is the 17th busiest airport in the nation, and the sixth worst in terms of delays. With growing demand for its services, Logan has not had any significant runway improvements in 25 years. A new runway for Logan Airport is vital for the state's continued economic growth. Without it, delays will get much worse; with it MassPort has predicted a 25% reduction in delays.

NAIOP and the research group, Mass Insight, have produced "The Massachusetts Expansion Report" the last four years, based on interviews with senior executives in the top growth sectors in the state. Over the last two years, access and reliability at Logan Airport were singled out as significant disadvantages to Massachusetts businesses. The companies that are growing in Massachusetts engage in a great deal of air travel by employees and clients (consulting, money management, high tech, telecommunications, etc.). The frequency with which Logan is closed due to weather relative to places like Chicago, Dallas, or Atlanta, was specifically cited. These business executives and their site location consultants say Logan Airport improvements are a top priority. 135.2

Although Massport's plans also include expansion of service at other regional airports, an expanded rail service to Rhode Island, and a new high-speed rail service with New York City; alone, they are not sufficient to resolve the long term flight delay problems.

By redirecting small and mid-size planes to the planned "14-32" uni-directional runway, pressure would be taken off of the other runways, especially during the potentially crippling conditions with a northwest

wind that presently causes Logan to limit runway usage and ground flights.

The Massachusetts Chapter of NAIOP (National Association of Industrial and Office Properties) represents the commercial real estate industry through its legislative affairs efforts, educational programs, and its continual research into critical issues of business development. NAIOP is the leading voice for commercial real estate in the state and represents the interests of companies involved with the development, ownership, management, and financing of commercial properties as well as those companies providing services to this industry. Our membership consists of over 350 members who own or manage more than 85 million square feet of office, research & development, and industrial space in the Commonwealth.

Sincerely,

NAIOP, MASSACHUSETTS
National Association of Industrial and Office Properties

David I. Begelfer
Executive Director

Letter 135
National Association of Industrial and Office Properties
David I. Begelfer, Executive Director

Code	Topic 1	Topic 2	Comment	Response
135.1	General Support		NAIOP strongly supports Massport's Logan Delay Reduction Program in general and the cornerstone of this proposal, a new uni-directional runway.	Comment noted.
135.2	Purpose and Need	Delay	NAIOP and the research group, Mass Insight, have produced "The Massachusetts Expansion Report" the last four years, based on interviews with senior executives in the top growth sectors in the state. Over the last two years, access and reliability at Logan Airport were singled out as significant disadvantages to Massachusetts businesses.	Comment noted.

LETTER 136

900 Second Street, N.E.
Suite 308
Washington, DC
20002-3557

Phone 202-408-8362
Fax 202-408-8287
E-mail narp@narprail.org
Web www.narprail.org

National Association of Railroad Passengers

Officers and Staff

Sident
I R. Martin, GA

President
Erik Lange, CA

Secretary
Robert W. Glover, CA

Treasurer
Joseph F. Horning Jr., DC

Executive Director
Ross B. Capon

Assistant Director
Scott Leonard

Membership Director
Jane L. Colgrove

Board of Directors

Robert P. Abraham, PA
Stuart N. Adams, WA
Paul D. Arden, IN
George Arnsel, NY
Frank Barry, NY
Gregory Bender, NJ
George W. Billmyer III, VA
Ronald P. Boardman, Jr., IL
Douglas J. Bowen, NJ
Kenneth A. Briers, DC
Doris Briggs, CA
Ken Burbach, WI
Andrew J. Cebal, NY
Mark D. Carlson, OH
George Chilton, AZ
James R. Churchill, VA
James D. Ciaccierelli, NJ
Wayne E. Davis, ME
John A. Dawson, PA
James A. Dingus Jr., OH
Dino Drudi, DC
Charles A. Dunn, FL
Carl Fowler, VT
George Gackle, CA
Alan J. Gebauer, MI
Cecelia, TX
M. Goddard, Jr., CA
J. Gregoire, MA
ry Hall, CT
n Hamilton, MA
James Hamre, WA
J. Howard Harding, OH
Paul R. Hart, PA
John Hefner, VA
Lewis M. Hoppe, NY
David O. Jones, CT
Jay Jones, CO
Lawrence T. Joyce, PA
John H. Kirkwood, CA
Richard Kulla, NY
Bob LaPrelle, TX
Edward P. Leight, WI
Robert Lenz, NY
Ernest L. Lester, IA
Daniel B. Lovegren, CA
Dan Lutz, NE
George McCallum, PA
Michael S. McGrath, MO
John A. Mills, KS
Robert W. Moen, MN
Hans S. Mueller, WA
Steven H. Musca, RI
Greg Nazarow, NH
John D. Parkyn, WI
Keith Perry, KY
Arthur Poole, OR
John W. Porco, MD
Robert A. Ramsay, CA
David Randall, IL
Donald P. Robinson, IL
John A. Ross, NY
Stephen J. Salatti, NY
Sharon Schreyer, PA
M. Paul Shore, VA
Richard L. Silver, CA
John Sita, Jr., LA
Eugene K. Skoropowski, FL
Jim Stevenson, OH
Donald M. Stewart, Jr., NC
David Tomiak, IL
Stephen von Bonin, DE
Edmund J. Von Nordeck, CA
Mike Weber, OH
*William B. Weeks, WA
no Wolff, GA
M. Yorker, GA

April 23, 1999

Bob Durand, Secretary
Executive Office of Environmental Affairs, Attention: MEPA Office
Mr. Arthur Pugsley, EOEA No. 10458
100 Cambridge St., Room 2000
Boston, MA 02202

John C. Silva, Manager
Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Re: Massachusetts Port Authority (MPA) Logan Airside Improvements
Planning Project DEIS/DEIR – **EOEA No. 10458**
Boston-Logan International Airport

The National Association of Railroad Passengers, with 14,000 members nationwide, believes that the North Station-South Station Rail Link in Boston is the single most important rail passenger infrastructure investment opportunity in New England and one of the most important in the nation. For that reason, we gave our Golden Spike Award to Governor Weld and State Rep. John Businger, both of whom accepted the awards in person at our Washington reception in April, 1994. A year earlier, Senate Majority Leader George Mitchell came to accept the same award, in part for his role in securing $4 million for Amtrak for preliminary work on the Rail Link.

We are concerned that the above-captioned DEIS/DEIR does not reflect the importance of this opportunity.

136.1

1. **The Rail Link ridership diversion number shown in the Massport report is so low as to be completely lacking in credibility.**

I refer in particular to the claim that a North Station-South Station rail link would divert only 128 people a day from Logan to rail. ["The preliminary analysis conducted by project proponents indicates that the North-South Rail Link would increase 2020 intercity rail ridership on the Northeast Corridor primarily by diverting passengers from auto with only a small amount of diversion from air—approximately 46,700 passengers."]

- This figure [46,700 / 365 = 127.9] seems to completely discount improved connectivity between north-side commuter rail lines and high speed rail. In other words, it does not include people who are riding through the rail link tunnel on commuter rail but are doing so in order to connect with high speed rail at South Station.
- It clearly does not reflect operation of any trains between Maine and New York, which Amtrak certainly would run if the Rail Link existed. We understand that Amtrak is developing new numbers based on the assumption of some Portland-New York run-through service.
- It probably reflects a *very* conservative estimate of demand for the limited extensions of high-speed trains to Woburn cited.

2. **The report overstates the quality of existing New York-Washington service with respect to both frequency and speed.**

The result is to understate the ability of rail to attract ridership and market-share. In other words, existing New York-Washington market-share (about 40% of air-rail traffic, much higher if intermediate markets are included), has been achieved with fewer and slower trains than the report shows. The report therefore is misleading because it gives the reader a more pessimistic picture than the facts support regarding the amount of ridership that a given service level can attract.

The report states that "regular [non-Metroliner] trains generally take about 3 hours and 30 minutes with as many as 20 additional trains departing on weekdays in both directions." In fact, there are only 17 trips in each direction. Five of the southbound trains take between 3:35 and 3:50, a sixth takes 4:34; nine [over half!] of the northbound trains take 3:35-55.

The report states that Metroliners take "about 2:50". In fact, the fastest published time is 2:58, and is achieved by just one train (5:25 am from New York). Most trips are 2:59, a few are 3:05. [The standard weekend Metroliner running time is 3:04.]

The report states that New York-Washington trains "travel at an average speed of 100 mph." This is obviously untrue, since—as just noted—the fastest train scheduled takes 2:58, and so averages 76 mph on the 226-mile run. The *top* Metroliner speed is 125 mph. When intermediate stops and slow approaches (especially Baltimore and Philadelphia) are taken into account, a 100-mph average obviously is not possible.

[The report implies that there is more freight east of New York than west, but this also is not true. Indeed, Amtrak's freight revenues (payments by railroads running freight trains in the corridor) have been rising recently.]

3. **Similarly, by overstating existing New York-Boston frequencies and (presumably) accurately stating planned service, the report understates the degree to which the service will be improved.**

The report says there are ten Boston-New York trains a day in each direction, running times ranging from 4:10-5:00, but there are only eight realistic eastbound choices, nine westbound (including the *Twilight Shoreliner* that departs New York at 1 AM eastbound and arrives New York at 1:14 AM westbound).

The 9th and 10th eastbound trains and the 10th westbound are on the Inland Route; running-time: six hours.

- Most travelers will not take seriously the 3:55 PM Inland Route train from New York, which reaches Boston 28 minutes *after* the 4:55 from New York.
- Or the 9:40 PM from New York that arrives Boston at 3:40 AM.
- Or the 7:55 AM from Boston which reaches New York 50 minutes *after* the 8:25 AM from Boston.

In short, we believe that an accurate analysis would show that the Rail Link has far greater relevance to Boston airport requirements than is reflected in this DEIS/DEIR or the documents on which it relies. We believe this reflects a significant planning deficiency in the DEIS/DEIR and urge that these be addressed in a new Draft.

Thank you for considering our views.

Sincerely,

Ross B. Capon

Ross B. Capon
Executive Director

cc: John DeVillars, Director, Regional EPA
Robert Bartonowicy, Regional Director, FAA

Letter 136
National Association of Railroad Passengers
Ross B. Capon, Executive Director

Code	Topic 1	Topic 2	Comment	Response
136.1	Regional Transportation	Passenger Rail	The Rail Link ridership diversion number shown in the Massport report is so low as to be completely lacking in credibility.	The rail estimates are from existing, independent rail planning documents that examined total inter-city travel demand regardless of mode of travel and then predicted mode shifts that would result from implementing the rail project. Hence the rail estimates do not differ for the 37.5M and 45M Logan Airport passenger scenarios.

NASAO

LETTER 137

Alabama
Alaska
Arizona
Arkansas
California
Colorado
Connecticut
Delaware
Florida
Georgia
Guam
Hawaii
Idaho
Illinois
Indiana
Iowa
Kansas
Kentucky
Louisiana
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Missouri
Montana
Nebraska
Nevada
v Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Pennsylvania
Puerto Rico
Rhode Island
South Carolina
South Dakota
Tennessee
Texas
Utah
Vermont
Virginia
Washington
West Virginia
Wisconsin
Wyoming

April 12, 1999

Executive Office of Environmental Affairs
Attention: Mr. Arthur Pugsley
MEPA #10458
100 Cambridge Street, 20th Floor
Boston, MA 02202

Reference: EOEA #10458 Logan Airside Improvements

Dear Mr. Pugsley:

The undersigned state directors represent the following agencies that have responsibility for oversight of aeronautical activities within their respective states:

Connecticut Department of Transportation, Bureau of Aviation and Ports
Maine Department of Transportation, Office of Passenger Transportation
Massachusetts Aeronautics Commission (MAC)
New Hampshire Department of Transportation, Division of Aeronautics
Rhode Island Airport Corporation
Vermont Agency of Transportation, Division of Rail, Air, and Public Transportation

137.1

Please accept this letter as an expression of our strong support for the airside improvements and our firm opposition to the imposition of peak period pricing at Logan International Airport.

Contrary to published reports in the media, considerable planning has been done on a multi-state level to improve air service throughout New England. We have been working with the Federal Aviation Administration (FAA), the Massachusetts Port Authority (Massport), the New England Council and nine regional airports since 1994 to improve air service throughout New England. Those regional airports are:

Connecticut: Bradley International Airport and Tweed New Haven Airport
Maine: Bangor International Airport and Portland International Jetport
Massachusetts Aeronautics Commission: New Bedford Regional Airport and Worcester Regional Airport
New Hampshire: Manchester Airport

Rhode Island: T. F. Green Airport
Vermont: Burlington International Airport

In 1990, the MAC initiated a siting study commonly referred to as the Second Major Airport Study ("SMAS") to determine whether there were any suitable sites for a second major airport in Massachusetts. The SMAS started with 182 sites and eventually recommended further consideration of 2 sites at Fort Devens and in the Gardner/Winchendon area. In 1992, the MAC announced it would reevaluate air transportation demand and capacity in the context of a multi-modal, high speed transportation system and initiated a second study commonly referred to as the Strategic Assessment Report ("SAR") study. In November 1993, the final SAR report reconfirmed that the demand for air service at Logan will surpass capacity. More importantly, however, the SAR also identified several scenarios that, if implemented, could preclude the necessity for construction of a second major airport to meet that excess demand. Those scenarios include improved air service at regional airports, improved rail service, improved telecommunications technology, and airside improvements at Logan. The logic behind pursuit of these alternative solutions should be obvious given the staggering financial, environmental and social costs to construct a second major airport. Our mutual planning efforts were a natural progression from the SMAS and SAR and complement the analysis of surface transportation issues performed under the New England Transportation Initiative (NETI).

To date, we have:

- Identified existing air service levels at each regional airport.
- Estimated the degree of leakage; leakage was defined as the number of passengers in a regional airport's marketing area that used either Logan or the three New York City (NYC) Airports (LaGuardia, John F. Kennedy, and Newark).
- Analyzed potential for improved or new air service at the regional airports in New England.
- Conducted a Regional Airports Route Development Conference where representatives of the regional airports met with representatives of more than a dozen major, regional and Canadian air carriers (Air Nova, Air Ontario, American Eagle, Business Express, Cape Air, Commutair, Eastwind, Kiwi International, Northwest, Southwest, Trans World Airlines, USAir, and USAir Express).
- Assessed the potential impacts that improved air service at regional airports would have on air service at Logan.
- Designed a regional airport fare sampling methodology.
- Analyzed the results of a common fare pricing strategy at a regional airport.

In 1998, approximately 40% of the domestic destination passengers departing those regional airports and Logan departed from the regional airports, up from 35% in 1996. In that two year period, the total number of domestic enplanements at all ten airports rose by 13.4%; however, domestic

enplanements at the nine regional airports increased by more than 31% while Logan's domestic enplanements only increased by approximately 4%. Clearly, the combined efforts of the six state aviation agencies, the nine regional airports, the FAA and Massport are diverting demand away from Logan and to the regional airports. Each year, as the state directors and regional airports work with the FAA to update their respective Capital Improvement Plans, we consider both the local and the regional impacts of those proposed capital improvements. The new airport terminals, runway extensions, and other improvements at Bradley, Manchester, New Bedford, T.F. Green and Worcester are all complementary of our individual and joint efforts to improve regional air service throughout New England and they all contribute to reducing delays at Logan. 137.2

We urge you to approve the airside improvements proposed by Massport. Those improvements are necessary to ensure a safe and efficient New England airport system to serve scheduled passengers. Similarly, we object to any efforts to artificially constrain demand through the employment of peak period pricing. Notwithstanding the success of the regional airports, our communities will continue to utilize Logan for markets not served by the regional airports. 137.3 137.4

Kenneth J. Robert

Connecticut Department of Transportation

Maine Department of Transportation

Stephen N. Mucci

Massachusetts Aeronautics Commission

New Hampshire Department of Transportation

Elaine Roberts

Rhode Island Airport Corporation

Vermont Agency of Transportation

Letter 137
National Association of State Aviation Officials New England State Directors

Code	Topic 1	Topic 2	Comment	Response
137.1	Alternatives	Preferred Alternative	The undersigned state directors represent the following agencies that have responsibility for oversight of aeronautical activities within their respective states: Connecticut Department of Transportation, Bureau of Aviation and Ports; Maine Department of Transportation, Office of Passenger Transportation; Massachusetts Aeronautics Commission (MAC); New Hampshire Department of Transportation, Division of Aeronautics; Rhode Island Airport Corporation; Vermont Agency of Transportation, Division of Rail, Air, and Public Transportation. Please accept this letter as an expression of our strong support for the airside improvements ...at Logan International Airport.	Comment noted.
137.2	Regional Transportation	Regional Airports	...the combined efforts of the six state aviation agencies, the nine regional airports, the FAA and Massport are diverting demand away from Logan and to the regional airports.	Comment noted.
137.3	Alternatives	Preferred Alternatives	We urge you to approve the airside improvements proposed by Massport. Those improvements are necessary to ensure a safe and efficient New England airport system to serve scheduled passengers.	Comment noted.
137.4	Alternatives	Peak Period Pricing	...we object to any efforts to artificially constrain demand through the employment of peak period pricing. Notwithstanding the success of the regional airports, our communities will continue to utilize Logan for markets not served by the regional airports.	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.

LETTER 138

April 12, 1999

Alabama
Alaska
Arizona
Arkansas
California
Colorado
Connecticut
Delaware
Florida
Georgia
Guam
Hawaii
Idaho
Illinois
Indiana
Iowa
Kansas
Kentucky
Louisiana
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Missouri
Montana
Nebraska
Nevada
Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Pennsylvania
Puerto Rico
Rhode Island
South Carolina
South Dakota
Tennessee
Texas
Utah
Vermont
Virginia
Washington
West Virginia
Wisconsin
Wyoming

Executive Office of Environmental Affairs
Attention: Mr. Arthur Pugsley
MEPA #10458
100 Cambridge Street, 20th Floor
Boston, MA 02202

Reference: EOEA #10458 Logan Airside Improvements

Dear Mr. Pugsley:

Reference is made to the letter dated April 12, 1999 to you regarding the subject Environmental Impact Statement/Report EOEA #10458.

This is to confirm that the National Association of State Aviation Officials has reviewed said letter and endorses the recommendations and findings contained therein. We urge you to approve the airside improvements proposed by Massport and we object to any efforts to artificially constrain demand through the employment of peak period pricing. 138.1

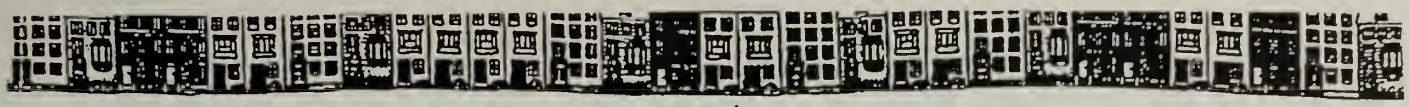
Sincerely,

William E. Gehman
Chairman

Henry M. Ogrodzinski
President & CEO

Letter 138
National Association of State Aviation Officials
William E. Gehman, Chairman
Henry M. Ogrodzinsk, President and CEO

Code	Topic 1	Topic 2	Comment	Response
138.1	Alternatives	Preferred Alternative	We urge you to approve the airside improvements proposed by Massport and we object to any efforts to artificially constrain demand through the employment of peak period pricing.	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.



NEIGHBORHOOD ASSOCIATION OF THE BACK BAY, INC.

LETTER 139

April 23, 1999

Mr. Arthur Pugsley
Executive Office of Environmental Affairs
MEPA Unit
EOEA #14508
100 Cambridge Street
Boston, Massachusetts 02202

Dear Mr. Pugsley:

The Neighborhood Association of the Back Back is writing to request that MEPA reject the draft Environmental Impact Report (EIR) submitted by the Massachusetts Port Authority (Massport) relative to the proposed Runway 14/32. We firmly believe that the EIR insufficiently addressed environmental impacts of Runway 14/32. Specifically, the EIR fails to adequately address (1) landside environmental impacts and (2) the necessity to regionalize airline traffic. In addition, the EIR utilizes inconclusive data relative to delays at Logan International Airport (Logan).

Landside Impacts

The EIR fails to address landside impacts of the proposed Runway 14/32. Massport has stated that the new runway will increase the number of annual passengers from the current 26 million to more than 37 million by 2010. These increases in passengers and airline traffic will have dramatic impacts on residents in and around Boston. 139.1

The added capacity and the resulting increased use of Runways 9/27 and 15/33 will inflict heavy noise impacts on Boston neighborhoods including East Boston, Charlestown, South Boston, Beacon Hill, Roxbury, Jamaica Plain and the Back Bay, and potentially areas such as Hyde Park, Roslindale and West Roxbury. In addition, the impacts on the streets and neighborhoods of Boston will be substantial. Such impacts include additional traffic caused by the increase in cars, trucks and shuttle buses serving the increase in passengers at Logan. 139.2 139.3

MEPA should reject the draft EIR because substantial landside impacts such as noise, traffic, productivity and general quality of life for Boston's neighborhoods have not been adequately addressed. 139.4

Lack of Regional Planning

The EIR fails to adequately address the necessity to regionalize airline traffic or to plan for another major airport. The EIR demonstrates that there has been no real planning by 139.5 139.6

Massport to promote the use of the region's other major airports in Massachusetts, New Hampshire and Rhode Island. In fact, growth at Green and Manchester airports has not been the result of planning, but from market forces related to cheaper airfares and easier traffic and commuter access. The EIR fails to address important issues such as planning for the provision of rail service to Green Airport, diversions to Manchester and Worcester airports and the effect of high speed rail service in the eastern corridor, among others.

In addition, even if Runway 14/32 is approved and built, Logan will soon reach its new capacity and Massport will seek additional runways to handle more airline traffic. Massport and the state should conduct a study of a second major airport that may serve the region in the next decade. Such a study in the 1980s included a potential site at the decommissioned Fort Devens. The study's recommendations, however, were never acted upon. Certainly, the EIR continues this failure to address the real need for a second major airport in the region. 139.7 139.8

MEPA should require that the EIR adequately address the regionalization of airline traffic and the need for a second major airport.

Inconclusive Data

The data upon which Massport has relied in preparing the EIR is inconclusive at best. There are significant discrepancies in the EIR relative to the rate of delay at Logan used by Massport and those of the FAA and others, calling the reliability of the entire EIR into question. 139.9

The EIR also fails to adequately discuss factual data regarding delays and the actual causes of those delays. First, use of 1993 as a base year is deceiving. In 1993 Logan had a year of severe delays that has not been matched since. In fact, currently less than four percent of flights are delayed at Logan. Second, the EIR fails to address what portion of the delays were caused by wind and weather that would have closed runways or the entire airport regardless of the existence of Runway 14/32. 139.10 139.11

MEPA should require Massport to withdraw its EIR until it can confirm this critical delay data.

For all of the above reasons, we respectfully request that MEPA reject the draft EIR submitted by Massport relative to Runway 14/32.

Sincerely,
NEIGHBORHOOD ASSOCIATION OF THE BACK BAY

Peter Y. Flynn
Vice Chairman

Peter Sherin
Vice President

Letter 139
Neighborhood Association of the Back Bay, Inc.
Peter Y. Flynn, Vice Chairman

Code	Topic 1	Topic 2	Comment	Response
139.1	Cumulative Impacts	Landside Improvements	The EIR fails to address landside impacts of the proposed Runway 14/32.	The proposed improvements analyzed in the Supplemental DEIS/FEIR involve both construction and administrative actions that will facilitate aircraft operations (landings, takeoffs and taxiing). None of the improvements involve landside facility improvements (*e.g.*, terminals and roadways) or related operations. The Supplemental DEIS/FEIR analyzes in detail the impacts from aircraft operations, including analysis of noise and air quality impacts during the years 1993, 1998 and under future forecast scenarios as well as environmental benefits from certain of the improvement concepts under review. In this respect, the Supplemental DEIS/FEIR conforms with scoping directives from the lead federal agency (the FAA) and with applicable FAA environmental orders, all issued in accordance with NEPA, and with directives from EOEA issued under MEPA. The various GEIR documents, including the *Logan Airport 1998 Annual Update* and the *1999 Environmental Status and Progress Report* (previously GEIR), provide additional analytic context by examining cumulative impacts from airside (*i.e.*, aircraft) operations and landside (*e.g.*, vehicular traffic, terminal service vehicles) operations at Logan Airport as well as Massport's comprehensive mitigation program. The ESPR/GEIR is specifically incorporated by reference in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR as a background document. Each GEIR/ESPR submission is subject to public review and comment. The *Logan Airport 1998 Annual Update* and the *1999 ESPR* analysis is based on the same forecast levels used in the Supplemental DEIS/FEIR. The GEIR/ESPR informs Massport's planning process for all the improvements at Logan Airport, including the improvements under review in the Supplemental DEIS/FEIR. Consistent with past practice, Massport expects that the FAA will take the GEIR/ESPR analysis into account during its deliberations and ultimate decision on the Supplemental DEIS/FEIR.
139.2	Noise	Impacts	The added capacity and the resulting increased use of Runways 9/27 and 15/33 will inflict heavy noise impacts on Boston neighborhoods....	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
139.3	Ground Transportation	Traffic	[The proposed project will result in increased traffic in Boston.]	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).
139.4	Environmental Review Process	MEPA	MEPA should reject the draft EIR because substantial landside impacts such as noise, traffic, productivity and general quality of life for Boston's neighborhoods have not been adequately addressed.	Refer to response to Comment 139.1.
139.5	Environmental Review Process	MEPA	The EIR fails to adequately address the necessity to...plan for another major airport.	Comment noted.
139.6	Regional Transportation	Regional Airports	...there has been no real planning by Massport to promote the use of the region's other major airports in Massachusetts, New Hampshire and Rhode Island.	Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. Since January 2000 Massport has attracted three new airlines to Worcester Regional Airport. Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta on February 1, 2000 and will be increasing its service to three daily flights in April 2001. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. In February 2001, PanAm began daily scheduled service from Worcester to Orlando International Airport. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. A second summit was held in Rhode Island in December 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives. Massport disagrees that its record in diverting traffic to other airports is unsuccessful. Since 1996 eight out of ten new passengers in New England were directed to regional airports, which include T.F. Green/Providence, Worcester Regional, and Manchester airports. In 1999, Massport estimates that regional airports attracted 2.4 million passengers, that would have otherwise used Logan Airport. Massport disagrees that its record in diverting traffic to other airports is unsuccessful. Since 1996 eight out of ten new passengers in New England were directed to regional airports, which include T.F. Green/Providence, Worcester Regional, and Manchester airports. In 1999, Massport estimates that regional airports attracted 2.4 million passengers, that would have otherwise used Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
139.7	Alternatives	Runway 14/32	...even if Runway 14/32 is approved and built, Logan will soon reach its new capacity and Massport will seek additional runways to handle more airline traffic.	Neither Massport nor the FAA has a program to increase passenger demand at Logan Airport. Rather, the objective of both organizations is to accommodate demand safely and efficiently. The recommended Airside Project is intended to enable Logan Airport to accommodate current and future aircraft activity with minimum delay. The construction of Runway 14/32 would significantly reduce delays associated with northwest wind conditions, but would not be expected to induce additional aircraft traffic or passenger activity at Logan Airport.
139.8	Environmental Review Process	MEPA/NEPA	Massport and the state should conduct a study of a second major airport that may serve the region in the next decade.	Comment noted.
139.9	Delay	Model	There are significant discrepancies in the EIR relative to the rate of delay at Logan used by Massport and those of the FAA and others, calling the reliability of the entire EIR into question.	Chapter 4 of the Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays used in the Airside Project. Chapter 1 and Appendix C include a description of measures used by FAA and U.S. DOT to calculate delay, the limitations of those measures, an explanation of computer models for estimating flight delays, and historical delay data at Logan Airport and other major United States airports. The FAA Technical Center was responsible for the capacity and delay results in the 1992 FAA Capacity Enhancement Report for Logan Airport that concluded the need for Runway 14/32, reduced minimums and taxiway improvements. The Technical Center simulated Logan Airport airfield operations with the RDSIM model and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Airside Project Draft EIS/EIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates in 1992 with those of the Logan Airside Project estimates. The FAA has concluded that the Airside delays represent "a plausible and conservative estimate...." The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States Logan Airport's estimated annual delay hours are over five times the FAA's 20,000-hour threshold for a severely delayed airport.
139.10	Analysis Assumptions/ Methodologies	Base Year	...use of 1993 as a base year is deceiving.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.
139.11	Delay	Model	...the EIR fails to address what portion of the delays were caused by wind and weather that would have closed runways or the entire airport regardless of the existence of Runway 14/32.	The delay reductions presented in Chapter 4 of the Supplemental DEIS/FEIR are the result of the Airside Project alternatives. The remaining delays are largely due to wind and weather conditions that are not helped by Runway 14/32.

THE
NEW ENGLAND
COUNCIL

TESTIMONY OF JAMES T. BRETT
PRESIDENT & CEO
THE NEW ENGLAND COUNCIL
April 21, 1999

LETTER 140

MY NAME IS JAMES T. BRETT AND I AM THE PRESIDENT AND CEO OF THE NEW ENGLAND COUNCIL, A REGION-WIDE BUSINESS GROUP THAT PROMOTES POLICIES TO STIMULATE ECONOMIC GROWTH THROUGHOUT OUR SIX STATE NEW ENGLAND REGION. THANK YOU FOR THE OPPORTUNITY TO PRESENT COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND DRAFT ENVIRONMENTAL IMPACT REPORT ON THE LOGAN AIRSIDE IMPROVEMENTS PLANNING PROJECT.

TEN YEARS AGO, THE NEW ENGLAND COUNCIL JOINED AN ELUSIVE, AND ULTIMATELY FUTILE SEARCH FOR A SITE FOR A SECOND MAJOR AIRPORT FOR NEW ENGLAND. WE WERE MOTIVATED BY TWO FACTORS: THE INCREASING IMPORTANCE OF AIR TRAVEL FOR OUR REGION'S BUSINESSES AND FUTURE ECONOMIC GROWTH, AND THE LIKELY INABILITY OF THE REGION'S DOMINANT AIRPORT, BOSTON'S LOGAN INTERNATIONAL AIRPORT, TO ACCOMMODATE EVEN CONSERVATIVE ESTIMATES OF INCREASE IN DEMAND.

IN 1993, THE COUNCIL HELPED ESTABLISH A COALITION THAT GREW TO INCLUDE THE SIX STATE AVIATION DIRECTORS FROM NEW ENGLAND, MASSPORT, THE MANAGERS OF THE MAJOR JET SERVICE AIRPORTS IN THE REGION, AND THE FEDERAL AVIATION ADMINISTRATION. OUR SHARED GOAL WAS THE GREATER UTILIZATION OF THE REGIONAL AIRPORTS, BOTH AS A MEANS OF STIMULATING ECONOMIC ACTIVITY IN THE AREAS CLOSEST TO THOSE AIRPORTS AND TO RELIEVE THE OVERWHELMING BURDEN ON LOGAN AIRPORT. A TWO-YEAR STUDY YIELDED SOME FASCINATING INFORMATION AND HELPED POINT THE WAY FOR ACHIEVING THESE GOALS.

WE FOUND:

- MORE THAN 5 MILLION OF LOGAN'S PASSENGERS—ABOUT 25% OF LOGAN'S TOTAL TRAFFIC—LIVE CLOSER TO ONE OR MORE OF NEW ENGLAND'S REGIONAL AIRPORTS;

- NONE OF THE REGIONAL AIRPORTS IS FULLY ACHIEVING THEIR TRAFFIC POTENTIAL;

- WITH REASONABLE IMPROVEMENTS IN SERVICE LEVELS AND COMPETITIVE FARES, OUR STUDY FOUND THAT THE REGIONAL AIRPORTS COULD "RECAPTURE" 50% OF THE PASSENGERS IN THEIR MARKETS.

NOW, SOME TEN YEARS AFTER OUR UNSUCCESSFUL ATTEMPT TO SITE A SECOND AIRPORT IN THE REGION, AND WITHOUT MOVING AN OUNCE OF DIRT, NEW ENGLAND HAS ITS SECOND AIRPORT—IT'S JUST NOT ALL IN ONE LOCATION OR EVEN ONE STATE!

T.F. GREEN AIRPORT IN RHODE ISLAND HAS INCREASED ITS PASSENGER BASE FROM 2.5 MILLION IN 1996 TO 4.6 MILLION LAST YEAR, MAKING IT THE SECOND FASTEST GROWING AIRPORT IN THE NATION. MANCHESTER, NEW HAMPSHIRE'S AIRPORT HAS DOUBLED ITS PASSENGER LOAD FROM 1 MILLION IN 1996 TO 2 MILLION LAST YEAR. AND WITH MASSPORT ENGAGED IN NEGOTIATIONS TO TAKE OVER THE DAY TO DAY OPERATIONS AT WORCESTER AIRPORT—AN AIRPORT THAT ONLY A DECADE AGO WAS SERVICING NEARLY 400,000 PASSENGERS A YEAR, BUT THAT NOW IS STAGGERING—AND COMMITTED TO BRINGING COMMERCIAL, CARGO, AND CHARTER FLIGHTS BACK TO CENTRAL MASSACHUSETTS, THE POTENTIAL EXISTS TO ACCOMMODATE THE 1.7 MILLION PASSENGERS WHO LIVE CLOSEST TO THAT FACILITY. COLLECTIVELY, THESE FACILITIES ARE, IN FACT, NEW ENGLAND'S SECOND AIRPORT.

THESE ACTIONS WILL CERTAINLY HELP RELIEVE A BURDEN ON LOGAN, AN AIRPORT THAT CONSISTENTLY RANKS AMONG THE NATION'S LEADERS IN DELAYS—AND THE ECONOMIC COSTS ASSOCIATED WITH THOSE DELAYS. BUT MORE NEEDS TO BE DONE. THAT'S WHY THE RECENT ANNOUNCEMENT BY AMTRAK THAT THEY WILL BEGIN HIGH SPEED RAIL SERVICE BETWEEN BOSTON AND NEW YORK CITY THIS FALL, REDUCING THE TRAVEL TIME BETWEEN THOSE CITIES TO THREE HOURS, IS SUCH WELCOME NEWS. AND WHY MASSPORT'S PLANS TO CONSTRUCT A NEW UNIDIRECTIONAL RUNWAY THAT WILL ONLY OPERATE OVER WATER, HAS BEEN HERALDED BY LEADERS OF BUSINESS AND GOVERNMENT.

THE ABILITY TO TRAVEL TO MIDTOWN MANHATTAN IN THREE HOURS WILL ATTRACT A SIGNIFICANT NUMBER OF PASSENGERS NOW FLYING TO NEW YORK'S LAGUARDIA AIRPORT ON LONG ISLAND AND TAKING CABS INTO MANHATTAN. THIS WILL RESULT IN A REDUCTION OF LANDSIDE CONGESTION THAT OFTEN MAKES LOGAN SO DIFFICULT TO NAVIGATE. FEWER CARS ENTERING LOGAN ALSO MEAN CLEANER AIR.

THE CONSTRUCTION OF A NEW RUNWAY, DESIGNATED 14/32, SIMILARLY WILL DIRECTLY ADDRESS THE PROBLEM OF DELAYS WHICH DISPROPORTIONATELY AFFECTS THIS AIRPORT AND THE PEOPLE WHO USE IT. IN 1998, LOGAN EXPERIENCED OVER 143,000 HOURS OF DELAYS, FIVE TIMES THE FAA THRESHOLD FOR CONGESTION. ACCORDING TO MASSPORT, DELAYS AT LOGAN COST AIRLINES AND THEIR PASSENGERS APPROXIMATELY $310 MILLION LAST YEAR. IF NO ACTION IS TAKEN, IT IS ESTIMATED THAT BY 2010 THERE WILL BE 596,000 HOURS OF DELAYS. TO PUT THIS IN MORE PERSONAL TERMS, PASSENGERS COULD EXPECT AN AVERAGE DELAY OF 54 MINUTES EVERY TIME THEY FLY IN OR OUT OF LOGAN AIRPORT.

MOST DELAYS ARE CAUSED BY WIND AND WEATHER CONDITIONS AT LOGAN. A STRONG NORTHWEST WIND CAN REDUCE THE NUMBER OF OPERATIONAL RUNWAYS FROM THREE TO TWO OR EVEN ONE. UNDER NORMAL WEATHER CONDITIONS, LOGAN CAN ACCOMMODATE 120 OPERATIONS PER HOUR; WITH TWO RUNWAYS, LOGAN'S OPERATIONS DROP TO 90 PER HOUR AND WITH ONE RUNWAY, LOGAN'S OPERATIONS PLUNGE TO 60 PER HOUR.
RUNWAY 14/32 WOULD REDUCE ANNUAL DELAYS AT LOGAN BY 21% AND VIRTUALLY ELIMINATE ANY DELAYS RESULTING FROM NORTHWEST WIND CONDITIONS.

AS A RESULT, CURRENT AND PROJECTED FLIGHT ACTIVITY AT LOGAN DOES NOT EXCEED THE CAPACITY OF THE FACILITY. THAT'S WHY THE NOTION OF "PEAK HOUR PRICING" IS NOT A REASONABLE ALTERNATIVE—AND PERHAPS WHY NO AIRPORT IN THE NATION UTILIZES THAT PRICING SYSTEM. PEAK HOUR PRICING WOULD SIMPLY REDUCE THE NUMBER OF AIRCRAFT USING LOGAN BY MAKING IT UNECONOMICAL TO DO SO—AND CAUSE ENORMOUS HARM TO THOSE FROM OTHER NEW ENGLAND STATES WHO HAVE NO CHOICE BUT TO USE LOGAN AS THE CONNECTING AIRPORT FOR THEIR ULTIMATE DESTINATION. WE HAVE STUDIED THIS ISSUE AND DETERMINED THAT IT ADDRESSES A PROBLEM THAT LOGAN IS NOT EXPERIENCING. 140.1

MASSPORT HAS MADE AN IMPORTANT COMMITMENT TO USE THE NEW RUNWAY FOR ONLY OVER WATER TAKE-OFFS AND LANDINGS. AS A RESULT, 75,000 OPERATIONS—FULLY 15% OF TOTAL AIRPORT OPERATIONS—WOULD SHIFT FROM PATHS OVER COMMUNITIES TO FLIGHT PATHS OVER WATER. THOSE COMMUNITIES CURRENTLY EXPERIENCING THE MOST SEVERE NOISE IMPACT WOULD SEE SIGNIFICANT BENEFITS. IT IS TRUE THAT SOME COMMUNITIES WOULD SEE A SLIGHT INCREASE IN NOISE; MASSPORT HAS COMMITTED TO PROVIDING SOUNDPROOFING FOR THESE COMMUNITIES.

NEW ENGLAND IS FAST DEVELOPING A REGIONAL TRANSPORTATION SYSTEM CAPABLE OF SERVING THE NEEDS OF A GROWING ECONOMY-- A SYSTEM THAT WILL SOON INCLUDE HIGH SPEED RAIL TO NEW YORK CITY, A THRIVING GROUP OF REGIONAL AIRPORTS THROUGHOUT NEW ENGLAND, IMPROVED ACCESS TO THOSE AIRPORTS AND STEPS TO ENHANCE THE EFFICIENCY AND EFFECTIVENESS OF LOGAN AIRPORT. TOGETHER, THESE ACTIONS ARE ALLOWING NEW ENGLANDERS TO APPROACH THE 21ST CENTURY WITH BOTH OPTIMISM AND PRIDE THAT WE HAVE LEADERS WITH VISION AND COURAGE CHARTING THE COURSE FOR SUSTAINED ECONOMIC GROWTH. THEY DESERVE OUR FULL SUPPORT. 140.2

THANK YOU FOR THE OPPORTUNITY TO CONTRIBUTE MY VIEWS ON THIS IMPORTANT ISSUE.

Letter 140
New England Council
James T. Brett, President and CEO

Code	Topic 1	Topic 2	Comment	Response
140.1	Alternatives	Peak Period Pricing	Peak period pricing would simply reduce the number of aircraft using Logan by making it uneconomical to do so—and cause enormous harm to those from other New England states who have no choice but to use Logan as the connecting airport for their ultimate destination.	Refer to Section 4.5 of the Supplemental DEIS/FEIR for an expanded discussion of PPP. An exemption program designed to protect services to small communities most reliant on Boston for access to the national air transport system is described in Section 4.5.3 of the Supplemental DEIS/FEIR. The section provides an illustrative exemption program and its impact on the delay reduction potential of PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.
140.2	Alternatives	Preferred Alternatives	...[The proposed project] deserve[s] our full support.	Comment noted.

LETTER 141

N.E.E.D. Logan

New England's Economy Depends on Logan
P.O. Box 131, Cummaquid, MA 02637
(508) 362-3981/ Fax (508) 362-4812
fgibson@capecodjournal.com

April 23, 1999

MEPA Office
FAX (617) 727-1598
Attention: Mr. Arthur Pugsley
Re: EOEA #10458
13 pages including this one

Attached is a copy of a copy of my testimony at your FAA/MEPA hearing on April 7, 1999.

Also attached is my testimony to the Joint Transportation Committee in regard to House Bills No/ 1676 and 1678 on March 23, 1999.

I'd like to add that flying to Logan from Hyannis in a Cape Air Cessna 402 to attend your April 7 hearing was a perfect example of what 14/32 could do to alleviate delays at Logan We were approaching Logan about 5:00 p.m. and were advised that there would be approximately a 30 minute delay for runway 33L. If we could use 33R there would be no delay. We used 33R, straight in over the water.

Also attached are two opinion pieces from the Cape Cod Journal, "Massport Quiz," from the March 17 1999 issue and "Time to Squeak," from the April 11, 1999 issue. I would like to add them as comments.

Thank you

Fran Gibson

N.E.E.D. Logan

New England's Economy Depends on **Logan**
P.O. Box 131, Cummaquid, MA 02637
(508) 362-3981/ Fax (508) 362-4812
fgibson@capecodjournal.com

Testimony at FAA/MEPA hearing, April 7, 1999

My name is Frank Gibson. I live in Cummaquid, on Cape Cod, an area which depends upon air service to and from Boston.

I am a strong believer in the need to complete Runway 14/32 and the centerfield taxiway.

Back when a former Massport board proposed PACE – its Program for Airport Capacity Efficiency -- I organized a grass roots citizens group called **N.E.E.D. Logan** – New England's Economy **Depends on Logan** -- to oppose PACE, a program extremely detrimental to the airlines serving Cape Cod and the islands.

Thankfully, the FAA determined that PACE was ill advised and it was stopped. With regard to the current talk about peak period pricing and slots, there is no question that financial deterrents to limit access to Logan are not the answer to delays at Logan caused by weather. Do not be fooled by the comments made by Massport's then-executive director Dave Davis that PACE was effective in reducing delays. Delays were reduced at Logan during the period PACE was in effect but the record will show that during that same time period similar reductions in delays were experienced at all major airports monitored by the FAA. The reason for these reductions across the board was quite simple. The airlines adjusted their schedules by adding minutes to their scheduled flight times. This meant more flights arrived on time, or even ahead of schedule. Since none of the other airports were using financial deterrents such as PACE, it is obvious that the schedule changes, not financial deterrents, were responsible for the reduction in delays.

141.1

The important factor for any airport is its physical capacity to handle all the flights

-more-

scheduled by its users to arrive and depart as scheduled. And, as I understand it, when all of Logan's runways are available for safe use, Logan has the capacity to handle all the traffic scheduled by the airlines using it.

Using all its current runways, Logan can handle 120 operations per hour. However, when there are strong winds from the northwest, Logan is limited to one runway, 15/33, and operations are reduced to 60 per hour. Runway 14/33 is not meant to increase the number of aircraft using Logan. It is simply to allow the aircraft currently using Logan to arrive and depart with out delays. 141.2

The completion of runway 14/32 for use in strong northwest wind conditions would give Logan much needed relief during the times when it is currently limited to operations on 15/33

The completion of 14/32 would also enhance utilization of Logan at all times. By eliminating the need for the smaller aircraft that represent almost half of Logan's operations to have a six-mile separation behind large aircraft, Logan's operational efficiency to handle both large and small aircraft is increased.

Since aircraft arrivals and departures on 14/32 would be over water aircraft noise would be negligible . For those skeptical of this statement, I invite you to visit Barnstable Municipal Airport Standing in the Airport Plaza parking lot, directly across Route 28 from the end of runway 24, you can see the airplanes approach and land as if you were standing in front of the Harborside Hotel. I say you can *see* them. Note that I did not say you can *hear* them, because you can't hear them over the normal ambient noise of Hyannis. Using 14/32 the airplanes would be like polite children – seen but not heard.

-more-

New England's Economy Depends on Logan. Logan's future depends on 14/32.
I ask that those who oppose 14/32 listen to the facts rather than react emotionally to misrepresentations of the facts.
They would discover that 14/32 is a win-win proposition for everyone.

N.E.E.D. Logan

New England's Economy Depends on Logan
P.O. Box 131, Cummaquid, MA 02637
(508) 362-3981/ Fax (508) 362-4812
fgibson@capecodjournal.com

Testimony at Joint Transportation Committee hearing, 3-23-99

My name is Frank Gibson. I live in Cummaquid, on Cape Cod, an area which depends upon air service to and from Boston.

I am a strong believer in the need to complete Runway 14/32 and the centerfield taxiway. I am here to oppose House Bills No. 1676 and 1678.
Back when a former Massport board proposed PACE -- its Program for Airport Capacity Efficiency -- I organized a grass roots citizens group called **N.E.E.D. Logan** -- New England's Economy Depends on **Logan** -- to oppose PACE, a program extremely detrimental to the airlines serving Cape Cod and the islands.

Thankfully, the FAA determined that PACE was ill advised and it was stopped. With regard to the current talk about peak period pricing and slots (House Bill 1679), there is no question that financial deterrents to limit access to Logan are not the answer to delays at Logan caused by weather. Do not be fooled by the comments made by Massport's then-executive director Dave Davis that PACE was effective in reducing delays. Delays were reduced at Logan during the period PACE was in effect but the record will show that during that same time period similar reductions in delays were experienced at all major airports monitored by the FAA. The reason for these reductions across the board was quite simple. The airlines adjusted their schedules by adding minutes to their scheduled flight times. This meant more flights arrived on time, or even ahead of schedule. Since none of the other airports were using financial deterrents such as PACE, it is obvious that the schedule changes, not financial deterrents, were responsible for the reduction in delays.

-more-

The important factor for any airport is its physical capacity to handle all the flights scheduled by its users to arrive and depart as scheduled. And, as I understand it, when all of Logan's runways are available for safe use, Logan has the capacity to handle all the traffic scheduled by the airlines using it.

Using all its current runways, Logan can handle 120 operations per hour. However, when there are strong winds from the northwest, Logan is limited to one runway, 15/33, and operations are reduced to 60 per hour. Runway 14/33 is not meant to increase the number of aircraft using Logan. It is simply to allow the aircraft currently using Logan to arrive and depart with out delays.

The completion of runway 14/32 for use in strong northwest wind conditions would give Logan much needed relief during the times when it is currently limited to operations on 15/33.

The completion of 14/32 would also enhance utilization of Logan at all times. By eliminating the need for the smaller aircraft – that represent almost half of Logan's operations -- to have a six-mile separation behind large aircraft, Logan's operational efficiency to handle both large and small aircraft is increased.

Since aircraft arrivals on 14/32 would be approaching over water aircraft noise would be negligible. For those skeptical of this statement, I invite you to visit Barnstable Municipal Airport.

Standing in the Airport Plaza parking lot, which is directly across Route 28 from the end of runway 24, you can see the airplanes approach and land as if you were standing in front of the Harborside Hotel. I say you can *see* them. Note that I did not say you can *hear* them, because you can't hear them over the ambient noise of the Hyannis streets. Using 14/32 the airplanes would be like polite children – seen but not heard.

New England's Economy Depends on Logan.

Logan's future depends on 14/32.

I ask that those who oppose 14/32 listen to the facts rather than react emotionally to misrepresentations of the facts.

They would discover that 14/32 is a win-win proposition for everyone.

CLASSIFIEDS
ENTERTAINMENT
LETTERS
LIFESTYLE
LIVE POLL
LOTTERY
NEWS
NEWS BRIEFS
OPINION
SPORTS
TRAFFIC
WEATHER

ARCHIVES



ABOUT US
ADVERTISE

Make the CCJ your home page

Frank Gibson



THE ISSUE
SUBMIT COMMENTS
READER COMMENTS

Wednesday, March 17, 1999

Massport Quiz

THE ISSUE

Fact: Airplanes take-off and land into the wind.

Fact: Boston's Logan International Airport has four runways. Two parallel runways are aligned in a northeast/southwest direction, one is aligned east/west and one is aligned northwest/southeast.

Fact: Under normal circumstances Logan can handle 120 aircraft operations (take-offs and landings) per hour, enough capacity to handle the schedules of all the airlines utilizing Logan.

Fact: When there are very strong winds from the northwest, crosswinds make three of the four runways unfit for safe operations. This reduces the capacity of the airport to 60 operations per hour and causes delays.

Fact: Massport proposes to build a second runway aligned in a northwest/southeast direction to increase Logan's capacity when strong winds blow from the northwest.

Question 1: Does this seem like a logical idea?

Fact: The landing approach to the proposed second northwest runway would bring aircraft in over the water, avoiding residential areas.

Question 2: Does this seem like a logical idea?

Unfortunate Fact: There are people who do not want the second runway built. Their answer to the delays caused by winds that limit Logan to one runway is to charge landing fees that would limit access to the airport, their idea being that if Logan's capacity becomes weather-restricted to 60 aircraft per hour instead of its normal 120, 60 aircraft will be priced out of landing.

Question 3: Does this seem like a logical idea?

Misconception: The people who do not want the second runway say that having another runway will increase the traffic at Logan.

Fact: Massport points out that the second runway would simply allow the planes currently scheduled to operate at Logan to do so with a minimum of delays.

Question 4: Does Massport's explanation sound logical?

We ask these questions because to us the answers to questions 1, 2 and 4 are obviously yes and the answer to question 3 is just as obviously no. The problem is that there are a lot of people in the Logan neighborhoods whose answers are just the opposite and they have been successfully fighting construction of the runway for 25 years.

Why? Because they don't trust Massport.

Here is what Massport has to say about the situation at Logan:

> *In 1998, Logan experienced over 120,000 hours of delay, compared to the 20,000 hours of delay that is the annual congestion threshold established by the FAA. Delays at Logan are consistently among the worst in the U.S., ranking sixth in the U.S. for total delays. And the problem has worsened dramatically -- delays rose more than 20 percent over the past year alone.*
>
> *Since 1970, about the time the second northwest/southeast runway was proposed, annual passenger volumes at Logan have increased by 277 percent and annual operations have increased by 156 percent.*
>
> *Logan's disproportionately high ranking in aircraft activity reflects the uniquely high levels of regional carrier flights operated with smaller, non-jet aircraft, such as CapeAir/Nantucket Airlines Cessnas. Roughly half of Logan's operations are by regional air carriers, making Logan the U.S. airport with the highest amount of regional carrier activity. Such regional carriers are significant contributors to the vitality of the New England economy. Most of New England's regional carriers have code-sharing relationships with different national and international airlines.*
>
> *The smaller planes further influence operational activity because they must have a greater separation distance from a larger jet. When a small plane follows a larger jet, there must be a separation distance of up to six miles between the two. The smaller planes are not heavy enough to withstand the turbulence of a leading jet. When the percentage of regional carriers increases, the need to provide greater separation between aircraft increases. This necessary "stretching out" of the arrival stream, while easily accommodated on a "normal" day, has a dramatic impact on congestion and delay in bad weather conditions.*
>
> *The proposed unidirectional commuter runway would allow commuter planes, which account for up to 54 percent of Logan's daily operations, to arrive and depart over water on a*

separate runway. By separating the commuter flights, the Tower would would be able to use the other runways for larger jets, allowing for the optimal number of (but not increasing) take offs and landings for both commuter planes and jets.

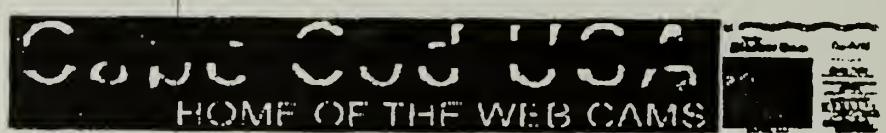
This runway would reduce annual delays in all conditions by more than 27 percent, increase the ability to meet community noise goals, and would result in a reduction of odor by 16 percent and ozone by 6 percent. Overall there would be a reduction in noise impacts for the majority of surrounding communities.

Question 5: Does Massport's proposal for the new runway sound logical?

Unfortunately, logic does not always prevail over politics, and for a quarter of a century the completion of the proposed runway (it was started in 1973) has been blocked by strong local politics.

To overcome the local politics the runway must have stronger support from the rest of Massachusetts and New England. Support from Cape Cod and the islands will be vital. Governor Cellucci is behind the runway. If you believe the runway is a logical solution to delays at Logan, it would help if you send him a message of support. It would help if you tell your state representative and it would be particularly helpful to tell Falmouth Representative Eric Turkington who is a member of the Joint Transportation Committee.

-- Written by Frank Gibson
THE CAPE COD JOURNAL



128 Parker Road, Osterville, MA 02655 • (508) 428-7000
Copyright ©1998 Cape Cod Journal. All rights reserved



Shortness of breath?

The Cape Cod Journal
AHEAD OF THE TIMES
Friday, April 23, 1999, Volume 2, Issue 4

Frank Gibson



THE ISSUE
SUBMIT COMMENTS
READER COMMENTS

Sunday, April 11, 1999

Time to Squeak

THE ISSUE

No doubt you have heard about or read about the runway that Massport is proposing to build at Boston Logan International Airport.

Why should Cape Codders care about what is happening at Logan?

Because Logan is our doorway to the world and Logan is the world's doorway to Cape Cod.

Why does Massport want to build the runway?

To relieve delays caused by adverse wind conditions; delays that make Logan one of the worst airports in the country in terms of delays. Last year Logan experienced 120,000 hours of delays, delays estimated to have cost the airlines and their passengers over $300 million.

How would the proposed runway reduce delays?

Aircraft take off and land into the wind. Logan has three sets of runways. Two parallel runways are aligned in a northeast/southwest direction, one is aligned in an east/west direction and one is aligned in a northwest/southeast direction. Under normal wind conditions that allow the use of all three of its available runway directions, Logan can handle 120 operations an hour. However, when there are strong winds from the northwest, the parallel NE/SW runways are not usable reducing operations to 90 per hour. In the worst case scenarios, when the E/W runway also becomes unusable, operations are reduced to 60 per hour. The proposed Runway 14/32 would give Logan a second NW runway which would alleviate the delays.

It should be noted that Runway 14/33 is not meant to increase the number of aircraft using Logan. It is simply to allow the aircraft currently using Logan to arrive and depart with out delays during adverse wind conditions.

However, the addition of 14/32 would enhance utilization of Logan at all

times. Currently, when on the approach for the same runway the smaller aircraft that represent almost half of Logan's operations have to maintain a six-mile separation behind large aircraft due to turbulence. 14/32 would provide separate approach paths for the large and small aircraft, increasing Logan's operational efficiency.

As Runway 14/32 is designed to bring aircraft in over the water rather than residential areas, the addition of 14/32 to Logan this would seem to be a win-win solution for Massport and its neighbors.

But the neighbors have mounted strong opposition to the runway. The neighbors have support from their local legislators and Congressman Joe Moakley has written to Jane Garvey, the FAA director, opposing Massport's plans. Congressman Michael Capuano has written to John DeVillars, Regional Administrator of the New England Environmental Protection Agency expressing "strong opposition" to Massport's plan for the runway.

I believe this opposition is a classic example of "Don't confuse me with the facts. My mind is made up."

The facts are simple. The runway is not designed to bring more aircraft into Logan, a misconception its opponents are spreading as gospel. It will not bring more noise to Boston's neighborhoods. The runway itself should reduce noise and any change in traffic patterns will simply redistribute the current noise.

At the FAA/MEPA hearing last Wednesday night to hear public comments on the proposed Environmental Impact Study for the runway and other airside improvements at Logan there were many public officials who spoke against the runway.

But there were also a number of businesses and associations who spoke in favor of it. They recognize that the economic future of Boston, Massachusetts and New England depend on a viable Logan Airport. These included Arthur D. Little, Associated Industries of Massachusetts, Boston Edison, Cape Air, Fidelity, Greater Boston Convention & Visitors Bureau, Hampshire House, Lily Truck Leasing, Massachusetts Business Roundtable, Massachusetts High Technology Council, Mass Insight, The New England Council, State Street Bank and the South Shore Chamber of Commerce.

At the Cape Cod Chamber of Commerce's Legislative Breakfast Friday morning, Senator Henri Rauschenbach stressed the importance of Runway 14/32 and urged all to contact Governor Cellucci and Peter Blute, executive director of Massport, to express support for the runway.

The voices against the runway are organized and loud. And, as the old saying goes, "The squeaky wheel gets the grease." It's time for the rest of us to squeak.

In addition of words of support to Cellucci and Blute, your written support of Massport's plans to the FAA and MEPA by the April 23 deadline for comments on Environmental Impact Study the would be appreciated.

Write to:

Airports Division
FAA New England Region
12 NE Executive Park
Burlington, MA 01083

and

MEPA Office
Arthur Pugsley
EOEA #10458
100 Cambridge Street, 20th Floor
Boston, MA 02202.

-- *Written by Frank Gibson*
THE CAPE COD JOURNAL



128 Parker Road, Osterville, MA 02655 • (508) 428-7000
Copyright ©1996 Cape Cod Journal. All rights reserved



Letter 141
New England's Economy Depends on Logan
Frank Gibson and testimony

Code	Topic 1	Topic 2	Comment	Response
141.1	Alternatives	Peak Period Pricing	...there is no question that financial deterrents to limit access to Logan are not the answer to delays at Logan caused by weather.	Comment noted.
141.2	Alternatives	Runway 14/32	Runway 14/33 is not meant to increase the number of aircraft using Logan. It is simply to allow the aircraft currently using Logan to arrive and depart without delays.	Comment noted.

NEW ENGLAND GUATEMALAN ALLIANCE

LETTER 142

Mr. Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, Boston, MA 02202

4/7/99

Dear Mr. Durand,

As an active member of Boston's Hispanic community and president of the New England Guatemalan Alliance (a network of Guatemalan people and organizations established in 1995), I urge you to reject Massport's EIS regarding runway 14/32 because it is biased, inadequate and uses out-dated figures from 1993, when the 1998 data (available on www.ASC.FAA.gov) clearly shows that delays at Logan have gone down significantly since 1992. MEPA regulations require the EIS to be clearly and concisely written in order to inform the public and policy makers of proposed development and various alternatives. This is where the EIS fails miserably. 142.1

The four-volume (600 pages plus per volume!) study is not clear or concise but terribly confusing and technical even for native English speakers. It does not adequately discuss viable alternatives to runway 14/32, such as peak hour pricing or land banking for a second airport and doesn't even *mention* the obvious alternative of sending all small planes to nearby Hanscom Airport. It doesn't discuss the "conservation potential" (as required in MEPA regulations) of these alternatives on humans, nature and natural resources. Massport's EIS shows two scenarios: "Logan with the runway" and "without the runway." In the name of fairness, the EIS should explain the benefits of other alternatives. 142.2

Most importantly, Massport's EIS does not consider the devastating environmental impacts on the **populations that will be most harmed by this runway - the majority of whom are inner city, lower-income and working class people - a significant proportion of whom are people of color.** 142.3 Chelsea has one of the largest Puerto Rican and Hispanic populations in the region. East Boston is presently home to the largest Central American population in Boston. Jamaica Plain, Roxbury, Dorchester and the South End also house large Hispanic, Caribbean and African populations. Aren't MEPA and other Federal and State regulations supposed to protect against transportation development that adversely impacts a disproportionate number of minority and lower income people?

Please reject Massport's EIS because of these and other inadequacies. Runway 14/32 is a short-sighted and unfair proposal. Massachusetts needs long-term regional transportation planning that will equitably distribute airplane noise, air pollution and auto congestion throughout various areas of the state, rather than supersaturate populations who already bear the lion's share of negative environmental impacts from regional transportation including but not limited to Logan Airport, three tunnels, highways, mass transit and hazardous oil tanks. This is not NIMBY, but rather a simple case of when is enough *enough* for inner city neighborhoods? Thank you. 142.4

Ignacio W. Ochoa

Ignacio W. Ochoa, President
New England Guatemalan Alliance

Letter 142
New England Guatemalan Alliance
Ignacio W. Ochoa, President

Code	Topic 1	Topic 2	Comment	Response
142.1	Analysis Assumptions/ Methodologies	Base Year	...Massport's EIS regarding runway 14/32 [should be rejected] because it is biased, inadequate and uses outdated figures from 1993, when the 1998 data...clearly shows that delays at Logan have gone down significantly since 1992.	Logan Airport flight delays, as measured by the FAA, did decline between 1993 and 1997. Nevertheless, the same data show that Logan Airport was consistently ranked as one of the nation's most delayed airports throughout this period. In 1998, delayed flights at Logan Airport, as reported by the FAA increased by more than 30 percent and continued to increase in 2000. In 2000, Logan Airport was second most delayed in the United States for arrivals. This represents the worst rank in Logan Airport's history. There are three reasons for the decline in delays between 1993 and 1997. First, in 1997, the number of hourly scheduled flights was less than Logan Airport's normal operating capacity of 120 flights per hour, unlike 1993, when airlines scheduled flights well beyond Logan Airport's hourly capacity. Second, Logan Airport's hourly demand profile is flatter than it was in 1993. Airlines are spreading scheduled flights throughout the day taking advantage of Logan Airport's off-peak hours (*e.g.*, 10 AM to 1 PM). Finally, airlines are carrying more passengers per flight. In fact, with roughly the same number of flights as in 1993, Logan Airport accommodated over 3 million more passengers. One reason for this is that the regional carrier network serving New England is more efficient. In 1993, there were three regional carrier systems serving 2.1 million regional passengers at Logan Airport. Since 1994, Logan Airport has been served by two regional airline systems (Business Express, now American Eagle, and US Airways Express). These carriers handled 2.2 million Logan Airport passengers in 1998. The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.
142.2	Environmental Review Process	MEPA	[The DEIR does not satisfy MEPA because it does not study a full range of alternatives.]	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.

Code	Topic 1	Topic 2	Comment	Response
142.3	Environmental Justice	Impacts	...Massport's EIS does not consider the devastating environmental impacts on the populations that will be most harmed by this runway—the majority of whom are inner city, lower-income and working class people—a significant proportion of whom are people of color.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.
142.4	Environmental Justice	Impacts	Massachusetts needs long-term regional transportation planning that will equitably distribute airplane noise, air pollution and auto congestion throughout various areas of the state, rather than supersaturate populations who already bear the lion's share of negative environmental impacts....	Regional initiatives to improve the efficiency of the region's inter-city transportation network have been studied since 1989. Section 2.1 of the Supplemental DEIS/FEIR summarizes relevant planning studies and their major conclusions. A regional transportation strategy that includes the expansion of regional airports, the development of high-speed rail, and the construction of Runway 14/32 and other infrastructure improvements at Logan Airport has evolved from these important studies. All the major improvements to the regional transportation system have been implemented except for improvements to Logan Airport's airfield. The regional airports have been experiencing tremendous growth in services and passenger traffic since 1996 and Amtrak introduced its high-speed Acela train service between Boston and New York in December 2000. Massport considers Logan Airport to be part of a regional system of airports that includes the T.F. Green/Providence, Manchester and Worcester Regional airports. Service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate growth in air travel demand. While greater use of the regional airports and high-speed rail will provide relief to Logan Airport, the proposed Airside Project provides clear benefits at current, as well as future, traffic levels. The benefits will only increase in the future, even as regional transportation developments act to reduce the rate of future growth at Logan Airport.

EOEA #10453

NPC Noise Pollution Clearinghouse

LETTER 143

Protecting the Commons:

Our effort to control second-hand noise is part of a greater effort to protect that which is held in common by the public from exploitation, abuse, and degradation. Other efforts to protect the commons are concerned with protecting our public lands and parks; air, airways, water, and waterways; habitat, species, and bio-diversity. What these efforts share is the recognition that our well-being is enhanced when the commons is used to maximize opportunities for everyone, and degraded when the commons is used to maximize profits or opportunities for a few, or to maximize only a few opportunities.

Some individuals and businesses feel that they have a right or the freedom to use a common resource in any way they see fit. Perhaps these people are mistakenly extending their own private property rights to that which is publicly owned or cared for and not exclusively their own. Perhaps they do not realize what most of us learned on the school yard years ago: "that my right to swing my fist ends at your nose." Or, perhaps they do not recognize the soundness of our parallel claim "that my right to create noise ends at your ear." In any case, these people are acting as bullies, claiming rights and freedoms that are not theirs while degrading resources that are ours.

Polluting the commons is not a right. Our effort to reduce noise pollution is similar to other efforts to reduce pollution and reassert our collective stewardship over the commons. Whether the issue is second-hand smoke, elevated mercury levels, or ground level ozone, the strategy is to protect the environment and our health and well-being by creating an ethic of the commons.

In seeking to advance an ethic of the commons, we first need to recognize that competing uses that exclude other uses of the commons or damaging uses that detract from other uses are not wise uses of a public good. The commons should be used in as many non-competing, non-damaging ways as possible. Noise, like many other pollutants, precludes many enjoyable uses of the commons and is not a wise use of the commons: loud late night parties, early morning garbage pick-up, or aircraft take-offs trump sleeping, reading, working, or listening to music.

We are seeking to improve human well-being by establishing an ethic for the commons that allows for as many non-consumptive and non-rival uses of the commons as possible. Human well-being is enhanced when individuals or groups such as the Noise Pollution Clearinghouse succeed in two ways: first, by minimizing damaging uses of the commons, and second, by maximizing the opportunities for non-competing uses. With respect to noise, help us by spreading the message that good neighbors keep their noise to themselves.

Subject: Noise protection in communist Hong Kong
From: "Ron Steinbach" <RonSteinbach@prodigy.net>
Date: 4/14/99 6:52 PM Pacific Daylight Time
Message-id: <7f3rd2$15ko$1@newssvr01-int.news.prodigy.com>

The following excerpt is from the South China Morning Post, October 14, 1998:

Residents urge 11pm flight ban

Noise from overnight flights has exceeded acceptable levels in Eastern District . . .

Residents have succeeded in getting flights rerouted from midnight until 7am starting from next Sunday,

but now they want rerouting to start from 11pm.

Provisional Urban Councillor Wong Kwok-hing, who represents Eastern District, has been measuring

noise from the flight path between 11pm and midnight.

It was found that noise from eight planes flying over the Wharf Centre in North Point on Monday exceeded the 55 decibels recommended by the Environmental Protection Department.

The average noise level was 66.3 decibels, with the highest level reaching 70.4, Mr Wong said.

My question is why the communist government in Hong Kong appears to be more sensitive to aircraft noise experienced by its citizens than the democratic government in the United States?

143.1

Subj: **Ky. Homeowners Flee Airport Noise**
Date: 4/18/99 11:38:46 PM Pacific Daylight Time
From: AOL News
`CC: Mooptdo

.y. Homeowners Flee Airport Noise

.c The Associated Press

By STEVE BAILEY

LOUISVILLE, Ky. (AP) -- Pat Philpott has lived in the same home for more than three decades. Naturally, she felt anxious when she leamed she would have to move to make room for an airport's expansion.

That was until she found out she could take everything with her: her sofa, her television, her antique dresser -- and all her neighbors.

Mrs. Philpott, 58, is among nearly 300 homeowners in Minor Lane Heights who over the next several years will pack up and move about 8 miles to the southeast.

It's part of an ambitious relocation plan that will keep their tiny incorporated community of about 1,700 residents at the southem edge of suburban Louisville from being dissolved.

``This community does a lot of things together -- Easter egg hunts, senior citizen dinners, picnics and festivals,'' Minor Lane Heights Mayor Fred Williams said. ``Why let go of all of that if you don't have to?''

On one side of Mrs. Philpott's new home will be the family she's lived beside for nearly 30 years. On the other side will be a woman who's lived across the street for 26 years. Other current neighbors will be across the street.

first, I didn't want to move, not at all,'' Mrs. Philpott said. ``I've lived here a long time and raised my sons here and made some .t friends. I didn't want to give all that up.''

Neither did many other residents, who banded together to make sure long-standing relationships would not be razed in the same fashion as their homes.

``We've lived here for 14 years and my parents live right next door,'' said 43-year-old Gerald Jackson, who along with his wife and two children will be among the first 50 families to have moved into their new homes by Thanksgiving.

``Everybody here looks out for each other like family. I couldn't imagine relocating anywhere away from a lot of these people, especially my folks,'' he said.

A groundbreaking ceremony for the new community was held March 28, but the process began more than five years ago when Louisville International Airport announced plans to open two new runways. That sparked outcries that the added noise would further burden thousands of already frazzled homeowners below the airport's flight path.

``From about 10 p.m. to 7 a.m., the roar is constant,'' Williams said. ``But it's not just the noise. The airport here has a great track record, but what goes up must come down. Eventually, there's going to be some kind of disaster.''

A solution was proposed: a $285 million federal and state grant program to buy out more than 3,700 area property owners so they could purchase homes in other locations.

To those who had lived in Minor Lane Heights for years, however, that wasn't good enough. They told airport officials they would agree to move on the condition that residents could move together.

``` n this whole situation came up about five years ago, the phones were ringing off the hook with people asking, `Where am I
```

going to go?' and `What am I going to do,"' Williams said.

``Someone proposed the idea of moving together. Right away, people started saying it couldn't be done. But our attitude was `Why ?' These days, you can do just about anything you want if you put your mind to it."

me residents have taken the buyout money and moved elsewhere. But most, about 300 of 440 homeowners, have chosen to relocate to the new city, called Heritage Creek.

``Everybody is tickled to death with this," said city Clerk Jan Skeeters. ``And the excitement really picked up when people started picking their lots. Even though they just see their names on a colored dot on a layout board, it's become reality."

The Federal Aviation Administration spends millions of dollars annually to help people living near airports cope with the unsettling problem of jet noise, soundproofing some houses and buying and tearing down others. The budget for the program was $200 million last year.

In this situation, the agency and the airport each chipped in $10 million to help purchase 287 acres of land at the new site.

Residents will be able to sell their property to the program to buy land in the new community, where they will move into a home comparable to the one they sold.

About 350 houses will be built in the first phase of construction with more planned over the next several years. Williams said the three-bedroom, one-bath homes will average about 1,000 square feet, although residents will be allowed to pay more for larger lots or amenities their current homes lack.

The new city hall will be a 100-year-old building already on the property, which officials plan to begin renovating as soon as the first residents move into their new homes.

``A few people have asked me about the downside to this situation," Skeeters said. ``Other than the fact they've got a lot of fond memories in those old houses, what possible downside is there?"

vY-04-19-99 0238EDT

EOEA #10458

[Archive: 28 March 1998]

news

Something in the air

By Harvey Black

the health of people who service jet aircraft could be harmed by aerosols of the fuel. At a meeting next week in San Antonio, Texas, researchers will describe animal studies suggesting that these aerosols damage the lungs and have subtle neurological effects.

Most military and commercial jets use a kerosene-rich fuel called JP-8 or Jet A, which has always been considered safe. But scientists are now starting to investigate the risks of breathing the aerosols of unburnt fuel that shoot into the air when an aircraft starts its engines.

Mark Witten, a respiratory physiologist at the University of Arizona in Tucson, has exposed rodents to aerosols of JP-8 containing droplets between 1·5 and 1·8 micrometres across--similar to those created by jet engines.

Even a single, hour-long exposure to an aerosol containing 50 milligrams of JP-8 per cubic metre increased lung permeability in mice and caused the loss of cilia, the hair-like projections that waft dirt out of bronchial tubes. "This will allow dust, pollen and other stuff in the lungs to set up a chronic inflammatory state," says Witten.

Other researchers are studying the effects of repeated exposure to JP-8. Carol Baldwin of the University of Arizona exposed five rats to aerosols containing 1000

and they said they seem to have more colds, more bronchitis, more chronic coughs than the people not exposed to jet fuel," says Witten.

At next week's meeting, sponsored by the US Air Force, the Environmental Protection Agency and the National Institute of Occupational Safety and Health, officials hope to lay down a plan for future epidemiological studies.

"What we're trying to do is develop exposure standards for anyone who works around an aircraft," says Major Les Smith of the Brooks Air Force Base in San Antonio, who chairs an Air Force committee looking at the health and environmental effects of JP-8.

CORNELL UNIVERSITY NEWS

Airport noise is harmful to the health and well-being of children and may cause lifelong problems, Cornell study shows

FOR RELEASE: March 4, 1998
Contact: Susan S. Lang
Office: (607) 255-3613
email

143.2

ITHACA, N.Y. -- The constant roar from jet aircraft can seriously affect the health and psychological well-being of children, according to a new Cornell University study. The health problems resulting from chronic airport noise, including higher blood pressure and boosted levels of stress hormones, the researchers say, may have lifelong effects.

"This study is probably the most definitive proof that noise causes stress and is harmful to humans," says Gary Evans, a professor of design and environmental analysis in Cornell's College of Human Ecology. This is, he says, the first longitudinal study of noise and human beings to look at the same group of individuals before and after noise pollution.

Other studies have been cross sectional, comparing people exposed to noise to well-matched controls who were not subjected to noise. Evans, an environmental psychologist and an international expert on environmental stress (such as noise, crowding and air pollution) and his German and Swedish colleagues, Monika Bullinger and Staffan Hygge, respectively, reported their findings in the January issue of Psychological Science, published by the American Psychological Association.

The researchers looked at 217 third- and fourth-grade children in rural areas 22 miles from Munich, Germany, before and after the opening of a new airport.

About half the children live in an area under the flight path of the new international airport; the others, who were matched for age, parental jobs, family size and socioeconomic status, live in quiet areas. The children were tested for blood pressure, stress hormone levels and quality of life six months before the airport was completed as well as six and 18 months after it opened.

The children in the chronic noise group experienced modest but significant increases in blood pressure and significant increases in stress hormones (epinephrine, norepinephrine and cortisol) while the children in the quiet areas experienced no significant changes. Eighteen months after the airport opened, the children exposed to the chronic aircraft noise also reported a significant decline in their quality of life.

"Although the increases in blood pressure were modest in the children living

under the flight path, they may predict a greater likelihood of having higher blood pressure throughout adulthood," says Evans. There are indications, he says, that elevated blood pressure in childhood predicts higher blood pressure later in life.

Boosts in stress hormones also are of concern because they indicate that noise induces physiological stress. These hormones are linked to adult illnesses, some of which are life-threatening, including high blood pressure, elevated lipids and cholesterol, heart disease and a reduction in the body's supply of disease-fighting immune cells.

Evans' and his colleagues' new study adds powerful evidence to cross- sectional and animals studies which have shown higher stress levels in children and adults working and living in chronically noisy environments.

Evans also reported last year that New York children living near an international airport tended to be poor listeners and did not read as well as matched children in quiet schools. Later this year, Evans hopes to report on how chronic noise affects reading, learning and mental health in the Munich study group.

The study was supported, in part, by the Society for the Psychological Study of Social Issues, the National Institutes of Health, the Nordic Scientific Group for Noise Effects, the Swedish Environmental Protection Agency and the German Research Foundation.

Letter 143
Noise Pollution Clearing House

Code	Topic 1	Topic 2	Comment	Response
143.1	Noise	Nighttime Noise	[Why does Hong Kong have a lower allowable decibel level (55) than Logan?]	The comment is unclear and difficult to interpret. Hong Kong's noise standards for its new Chek Lap Kok (CLK) Airport utilize a totally different noise metric (the Noise Exposure Forecast (NEF)) than is used at airports in the United States, and the allowable level is not 55 dB. Also, it is the FAA, not Massport, that establishes guidelines for land use compatibility in the United States. It should not be surprising that rule making agencies of two such widely different countries and cultures have differing needs and objectives.
143.2	Public Health	Effects	The constant roar from jet aircraft can seriously affect the health and psychological well-being of children, according to a new Cornell University study.	Massport has provided the City of Boston and public health agencies with air quality and emissions data. In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 *Report to the Mayor, Health of Boston* prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the *Soot Deposition Study* with public health agencies and is cooperating with the Harvard School of Public Health on the *South Boston Particle Source Apportionment Study.* Information on public health issues is provided in Chapter 6 of the Supplemental DEIS/FEIR.

Fax Cover Sheet

LETTER 144

DATE: April 22, 1999 TIME:

TO: Robert Durane PHONE:

COMPANY: Exec. Office of [illegible] Affairs FAX: 727-1388

FROM: John Mahony PHONE: (617) 989-1212

Nuestra CDC FAX: (617) 989-1218

RE: Runway expansion at Logan

Number of pages including cover sheet: [2]

Message:

I am writing to express my strong opposition to the runway expansion at Logan. In expressing this opposition, I want to make it clear that I am not an anti-growth fanatic but someone who sees that this is another example of the State taking a bandaid solution to a problem that will not address the real problem over the long term and will, as usual, impose its burden primarily on those of lower income.

Twenty-five years ago the State made a commitment to find an alternative to help relieve the congestion at Logan that would result from the expected growth of air traffic. Since that time, the State and its politicians have continually let opportunities pass to help address this issue. This has included letting Weymouth air station go as a possible alternate, failed to move on making Worcester a viable alternative and failing to push for Hanscom to provide some relief.

Now you are hypocritically hiding behind some screen that you are pursuing alternatives in Manchester and Warwick. Who are you kidding with this approach of having your cake and eating it too? The main reason these alternatives are expanding so much has nothing to do with your actions or any other actions of politicians in this State. It is simply the marketplace. This is happening because Logan is such a mess and the State has failed to fix this situation. The other reason is that Southwest Airlines has provided very inexpensive reliable service out of these airports. It is for these reasons that I, who live in Roslindale, go to Rhode Island. It is not because of your efforts. Using this as evidence that you are seeking alternative solutions really only illustrates your willingness to pass the buck politically to other States to solve a Massachusetts problem.

I am opposed to the runway expansion at Logan for the following reasons:

- As mentioned above, this is only a short-term band-aid solution and in another five years we will have even fewer options available to help solve the problems that will exist. 144.1
- It places an undue and unfair burden of noise pollution on areas already bearing too much of the burden for the entire State. I can appreciate the argument of people in the Lexington and Concord areas that people don't want all the noise pollution over those historic areas (that are just as much my areas as theirs). However the Arnold Arboretum, Mt Auburn Cemetery, and the Emerald Necklace are also historic areas that draw 144.2

hundreds of tourists who would appreciate more peace and quiet. For many years Hanscom was a viable airport with a considerable amount of traffic from large military planes so a small increase of corporate and small jets is not unfair. I am willing to take 80% of the burden of noise pollution while I am sitting on my porch, but I am unwilling to take 100%.

- As proven by their unwillingness to provide for a solution for the last 20 years as well as countless other broken promises, Massport can't be trusted in their promise that this will only be used to provide an alternate landing route to minimize delays, not to increase landings. In five years when the burden on Logan is even greater this promise will fall by the wayside. 144.3

- Logan and the area around it simply cannot handle any more vehicular traffic. Logan is on a peninsular with very similar access through pushing on residential neighborhoods. It cannot take any more traffic. This comes at a time when public health officials are increasingly concerned about the epidemic in childhood asthma. 144.4

- There is inadequate space at Logan to provide storage and ancillary facilities for shippers and the situation will only get worse with the construction of a new runway. This will increasingly force trucks and storage spaces into residential and retail areas. This was recently illustrated by a developer recently announcing plans to develop more than 100,000 square feet of warehouse space miles away from the airport. 144.5

Until such time as the State takes the following actions, I will be fully opposed to the expansion at Logan:

- Worcester Airport is built up as a viable alternative. This would include the State providing a direct access highway and the State pushing airlines, shippers, and corporate jets to use Worcester as an alternative. 144.6

- Pursue "peak-time" pricing to force corporate jets out as a cause of delays. 144.7

- Develop Hanscom as an alternate for corporate jets. This would not radically increase noise or vehicular traffic in the area but it would be another cog in the effort to reduce delays at Logan. Many of these jets are servicing clients in the Rte 128 area anyway so it would be in their best interest. 144.8

- Further pursue Manchester and Warwick as alternatives. This would include establishing train service to T.F. Green. 144.9

Letter 144
Nuestra, CDC
John Mahoney

Code	Topic 1	Topic 2	Comment	Response
144.1	Alternatives	Runway 14/32	...this is only a short-term band-aid solution and in another five years we will have even fewer options available to help solve the problems that will exist.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
144.2	Noise	Impacts	It places an undue and unfair burden of noise pollution on areas already bearing too much of the burden for the entire state.	Projected changes in flight patterns and associated noise shifts are consistent with the PRAS goals, which were studied and approved by the community when established. Activity increases over certain communities are offset by activity reductions over other severely impacted communities and by activity increases over water.
144.3	Alternatives	Runway 14/32	Massport can't be trusted in their promise that this [runway 14/32] will only be used to provide an alternate landing route to minimize delays, not to increase landings.	Neither Massport nor the FAA has a program to increase passenger demand at Logan Airport. Rather, the objective of both organizations is to accommodate demand safely and efficiently. The recommended Airside Project is intended to enable Logan Airport to accommodate current and future aircraft activity with minimum delay. The construction of Runway 14/32 would significantly reduce delays associated with northwest wind conditions, but would not be expected to induce additional aircraft traffic or passenger activity at Logan Airport.
144.4	Ground Transportation	Access to Logan	Logan and the area around it cannot handle any more vehicular traffic.	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).
144.5	Cumulative Impacts	Landside Improvements	There is inadequate space at Logan to provide storage and ancillary facilities for shippers and the situation will only get worse with the construction of a new runway.	Logan Airport's real estate is admittedly less than the desirable size. Since the existing area cannot be expanded, Massport proposed the Airside Project and is investigating other redevelopments to maximize efficiency, including relocating non-essential facilities off-airport. Runway 14/32 will be located on fill that was prepared for this purpose 25 years ago. The runway will not increase airfield capacity, but will dramatically reduce aircraft and passenger delays during northwest wind conditions.

Code	Topic 1	Topic 2	Comment	Response
144.6	Regional Transportation	Regional Airports	[Improve] Worcester Airport…as a viable alternative.	Massport has a long-standing relationship with the City of Worcester to aid Worcester Regional Airport in reaching its full potential, thereby improving the efficiency of the New England air transportation network. Massport assumed operational control of the Worcester Regional Airport on January 15, 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a discussion of Massport's efforts to promote increased utilization of Worcester Regional and the other regional airports.
144.7	Alternatives	Peak Period Pricing	Pursue "peak-time" pricing to force corporate jets out as a cause of delays.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport. See Section 4.5 of the Supplemental DEIS/FEIR.
144.8	Regional Transportation	Regional Airports	Develop Hanscom as an alternate for corporate jets.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
144.9	Regional Transportation	Regional Airports	Further pursue Manchester and Warwick as alternatives. This would include establishing train service to T.F. Green.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.



Pilot Block Neighborhood Association

LETTER 145

Pilot Block Neighborhood Assoc.
93 Pembroke St.
Boston, MA 02118
April 9, 1999

The Honorable Argeo Paul Cellucci
Governor Commonwealth of Massachusetts
State House - Rm 360
Boston, MA 02133

Dear Governor Cellucci:

I am writing on behalf of Pilot Block Neighborhood Association to urge you to reconsider your position on expanding Logan Airport with Runway 14/32. Very few cities have airports which are as close to their large population center as Boston. Boston and many surrounding towns and cities have long suffered from considerable noise and air pollution from the airport. The South End has had a dramatic increase in noise in the last year and the new runway will only make this worse. We all know that Logan Airport is here to stay and that we will have to continue to work to minimize the impact on its neighbors. But it is time to share the burden with other parts of this state. 145.1

Almost all major cities are served by more than one airport. With 57% of Logan's passengers coming from outside Rte. 128, we need to develop another airport to take the overload from Logan . And we need to develop a regional plan that will take us into the future, not settle for a stop gap measure that will help, at most, for five years and will place an increased burden on local communities. There are several options already in existence, Hanscom field (already underutilized), Worcester (which could be connected by a high speed rail line), and Ft. Devens. Not only would these airports decrease traffic and delays at Logan, but they could lighten the traffic on some of the most congested highways in Boston and give much easier access to air transportation to many of the 57% who live outside 128. And we need to look further afield to consider what makes sense in terms of other regional airports like Manchester and Providence. 145.2 145.3 145.4

Increasing air traffic at Logan is not good for business. Nobody wants to be in a city with so much airplane noise that you can't carry on a conversation. Nobody wants to endure the traffic congestion on the Central Artery and the lack of infrastructure to support increased air traffic. Nobody wants an unhealthy city, and the areas affected by the airport have elevated levels of respiratory problems and cancer. These need to be studied further. We shall urge the office of environmental affairs to do careful studies of these health risks. 145.5 145.6

We can develop this city in ways that don't sacrifice our quality of life, if we are ready to put the thought and committment into this goal. We need to have a Massport that makes good on its past commitments and that involves the communities it serves, not one that goes off and does its own thing regardless.

Please reconsider your position. Pilot Block Neighborhood Association voted unanimously to oppose the new runway 14/32.

Yours truly,

Cynthia J. Steil
President Pilot Block Neighborhood Assoc.

Letter 145
Pilot Block Neighborhood Association
Cynthia J. Steil, President

Code	Topic 1	Topic 2	Comment	Response
145.1	Alternatives	Runway 14/32	The South End has had a dramatic increase in noise in the last year and the new runway will only make this worse.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.
145.2	Regional Transportation	Regional Airports	With 57% of Logan's passengers coming from outside Rte. 128, we need to develop another airport to take the overload from Logan.	A second major airport is not a solution to the current delay and congestion problems at Logan Airport.
145.3	Regional Transportation	Regional Airports	....we need to develop a regional plan that will take us into the future, not settle for a stop gap measure that will help, at most, for five years and will place an increased burden on local communities.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport. While regional alternatives will relieve traffic growth pressures at Logan Airport, the proposed airside improvements are necessary and provide clear benefits at current traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail services act to reduce the rate of future growth at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
145.4	Regional Transportation	Regional Airport	...Hanscom field... Worcester... and Ft. Devens. ....decrease traffic and delays at Logan... [and] they could lighten the traffic on some of the most congested highways in Boston and give much easier access to air transportation to many of the 57% who live out side 128.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with the Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. By its agreement with the City of Worcester, Massport could assume ownership of the Worcester Regional Airport by 2005. On February 1, 2000, Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition, MassHighway is analyzing alternative highway routes that would improve surface access from I-90 and I-290 to the Worcester Regional Airport and filed an ENF in December 19991999 and is in the process of preparing a Draft EIS/EIR, which is expected to be filed in October 2001.
145.5	Purpose and Need	Delay	Increasing air traffic at Logan is not good for business. Nobody wants to be in a city with so much airplane noise that you can't carry on a conversation. Nobody wants to endure the traffic congestion on the Central Artery and the lack of infrastructure to support increased air traffic.	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).

Code	Topic 1	Topic 2	Comment	Response
145.6	Public Health	Effects	...the areas affected by the airport have elevated levels of respiratory problems and cancer. These need to be studied further. We shall urge the office of environmental affairs to do careful studies of these health risks.	Massport has provided the City of Boston and public health agencies with air quality and emissions data. In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 *Report to the Mayor, Health of Boston* prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the *Soot Deposition Study* with public health agencies and is cooperating with the Harvard School of Public Health on the *South Boston Particle Source Apportionment Study*. Information on public health issues is provided in Chapter 6 of the Supplemental DEIS/FEIR.

LETTER 146



April 7, 1999

PRI Automation, Inc., headquartered in Billerica, Massachusetts, is a leading global supplier of advanced factory automation systems and wafer-handling solutions that enhance the competitiveness of semiconductor manufacturers and OEM equipment suppliers. PRI is a member of The Massachusetts High Technology Council, Inc.

PRI Automation, Inc. has been in Massachusetts since it was originally founded in 1982 and currently employs over 500 Massachusetts residents out of a total of 1200 worldwide. We are a global company with a customer revenue base and operations at numerous locations in the U.S., Europe and Asia.

PRI spends on average $2.3 million in airfare traveling throughout the United States, Canada, Asia and Europe, installing and servicing customers' equipment and traveling between our facilities in California, Toronto, Europe and Asia. PRI's travel has increased at a rate of 20% annually and is expected to continue at that rate.

PRI employees take 2100 trips per year, most on short notice, leaving at all times of the day and night. In our business it is vital to meet the customers' demands all of which include arriving on time for sales meetings, and installing and servicing the equipment when the customer needs us there. Arriving too late could mean the loss of a potential contract. Efficiency is critical to our economic competitiveness. As PRI continues to strive for global presence, access to customers around the country and around the world is becoming increasingly important in order to remain a contender.

Delays at Logan Airport have been a constant loss to PRI in business time, and labor and travel costs as well as frustration to PRI travelers and inconvenience to customers visiting PRI headquarters. The proposed runway will alleviate the aircraft arrival and departure delay problem at Logan. Alternative airports will reduce congestion at Logan but not the delays, which will continue as a result of any wind related problem. New England weather is bad enough without adding wind direction to the list of delaying factors. 146.1

Another concern of PRI's is our employee's safety. The proposed changes will lower approach minimums for Logan's remaining four runways to industry standards. The lower minimums will give the pilots more time to decide whether to abort a landing. Reduced minimums will enhance safety and ease delays while giving air traffic controllers a choice of runways under poor weather conditions.

PRI employees have supported the use of regional airports such as Providence and Manchester but those airports do not meet the needs of all PRI travelers, nor do these regional airports meet the needs of our customer base who are worldwide. Traveling from Manchester and Providence is often more expensive, requires connections and flight options are insufficient. We support the use of these alternative airports but Logan will continue to be our major airport. 146.2

PRI's preferred airline carrier, United Airlines, will be spending $50 million to expand their operations at Logan Airport. According to the statistics, Logan Airport, the 17th busiest in the country had 120,000 hours of delays in 1998 and is the sixth worse airport for delays in the nation. The delays have been estimated to cost $310 million to airlines and passengers. For the second time in two months, all the major U.S. airlines have increased ticket prices by 7%. Preventable delays at Logan will only impact negatively on ticket prices. For an airline, time on the ground is money lost.

While remaining sympathetic to the needs of the neighboring towns of Logan Airport, PRI Automation, Inc. supports the proposed "delay-reduction runway" plan. The plan is a reasonable solution that will help the airport operate closer to its full potential while balancing the interests of the surrounding communities. 146.3

Sincerely,

Wendy Peters

Wendy Peters
Travel Manager

PRI Automation, Inc.
805 Middlesex Turnpike
Billerica, MA 01821
(978) 670-4270

Letter 146
PRI Automation
Wendy Peters, Travel Manager

Code	Topic 1	Topic 2	Comment	Response
146.1	Purpose and Need	Delay	Delays at Logan Airport have been a constant loss to PRI in business time, and labor and travel costs as well as frustration to PRI travelers and inconvenience to customers visiting PRI headquarters.	Comment noted.
146.2	Regional Transportation	Regional Airports	PRI employees have supported the use of regional airports such as Providence and Manchester but those airports do not meet the needs of all PRI travelers, nor do these regional airports meet the needs of our customer base who are worldwide. Traveling from Manchester and Providence is often more expensive, requires connections and flight options are insufficient. We support the use of these alternative airports but Logan will continue to be our major airport.	Comment noted.
146.3	Alternatives	Runway 14/32	While remaining sympathetic to the needs of the neighboring towns of Logan Airport, PRI Automation, Inc. supports the proposed "delay-reduction runway" plan.	Comment noted.

Provincetown Business Guild
P.O. Box 421-94
115 Bradford Street
Provincetown, MA 02657
(508) 487-2313

LETTER 147

22 April, 1999

BY OVERNIGHT MAIL

Secretary of Environmental Affairs
Attn. MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 022025

Dear Mr. Pugsley:

Attached please find a petition is support of runway 14/32 and in opposition to the establishment of peak period pricing at Logan Airport. This petition was circulated at the Provincetown Business Guild meeting held on April 14, 1999 and signed by every member present. In addition many non Provincetown Business Guild members have have sought me out to sign the petition.

The Provincetown Business Guild is an association comprised of two hundred seventy five (275) businesses located in Provincetown and the lower cape. The Provincetown Business Guild opposes peak pricing because it would end year round air service to Provincetown and the region. The majority of our members depend on Cape Air for year round air service. It is a vital link to Boston providing: (a) service in the case of medical emergencies; (b) convenient air travel for tourists traveling to Provincetown (our local economy is tourist driven); and (c) year round transportation for many individuals whose businesses are located in Provincetown with clients and customers located elsewhere in the country.

The Provincetown Business Guild supports the construction of proposed runway 14/32 and strongly urges you to prevent the implementation of peak period pricing at Logan now and at any time in the future. It is time to permanently shelve this idea that will have such a detrimental effect on the health safety and welfare of the region. 147.1

Sincerely yours,

Gary Reinhardt, President
Provincetown Business Guild

cc:. John C. Silva
Manager Environmental Programs
Airports Division, ANE-600
12 New England Executive Park
Burlington, MA 01803

Senator Henri Rauchenbach
State House Room 315
Boston, MA 02133-0154

State Representative Shirley Gomes
State House Room 156
Boston, MA 02133-1056

Hon. William Delahunt
146 Main Street
Hyannis, MA 02601

Petition in Support of Runway 14/32 and in Opposition to Increased Peak Period Pricing

Whereas, Provincetown relies on air service between Boston and Provincetown for (a) service for medical needs: (b) convenient air travel for tourists visiting Provincetown where tourism is the primary industry; and (c) year round transportation for many Provincetown and lower cape residents whose businesses are based in Provincetown with clients and customers located elsewhere in the country or abroad: and

Whereas, proposed runway 14/32 for small aircraft will increase efficiency and safety at Logan Airport without increasing either noise or air pollution over any Boston neighborhoods: and

Whereas, increased peak period pricing will make it economically impossible to continue the Boston/Provincetown route to the detriment of Provinctown's safety and economy,

WE THE UNDERSIGNED, support the development of runway 14/32 and oppose any increase in peak period pricing.

	Name	Address
1.	Sarah K. Peake	7 Center St Ptown MA 02657
2.	J. Michael Sullivan	11 STANDISH WAY P-TOWN MA 02657
3.	Tricia Zahn	14 W. Vine St. P-Town Ma 026
4.	[illegible]	15 Center St Provincetown MA 02657
5.	[illegible]	8 Cottage St. Provincetown MA 026
6.	[illegible]	27B Cowell St H3 PTown MA 026
7.	[illegible]	PO Box Provincetown MA 02657
8.	BC Mullaney	Box 923 Ptown Ma 02657
9.	[illegible]	PO Box 532 Provincetown 02657
10.	[illegible]	257 Bradford St. Provincetown 02657
11.	[illegible]	15 STANDISH WAY PROVINCETOWN MA 02
12.	[illegible]	188 Commercial St. Provincetown MA 0265

Petition in Support of Runway 14/32 and in Opposition to Increased Peak Period Pricing

Whereas, Provincetown relies on air service between Boston and Provincetown for (a) service for medical needs: (b) convenient air travel for tourists visiting Provincetown where tourism is the primary industry; and (c) year round transportation for many Provincetown and lower cape residents whose businesses are based in Provincetown with clients and customers located elsewhere in the country or abroad: and

Whereas, proposed runway 14/32 for small aircraft will increase efficiency and safety at Logan Airport without increasing either noise or air pollution over any Boston neighborhoods: and

Whereas, increased peak period pricing will make it economically impossible to continue the Boston/Provincetown route to the detriment of Provinctown's safety and economy.

WE THE UNDERSIGNED, support the development of runway 14/32 and oppose any increase in peak period pricing.

	Name	*Address*
1.	Stanley Wilson	6 Webster Place Ptwn MA 026
2.	GEORGE FROST	104-B COMMERCIAL ST. PTOWN MA 026
3.	[illegible]	16 COURT ST [illegible]
4.	Tom Watson	40 Bradford St. Ptown 02657
5.	Adam Trenberg	83 Bradford St Ptwn 02657
6.	Jen Borden / Harborside Realty	155 Court St " "
7.	Howard Weiner	5 Winslow St Provincetown, Ma 02657
8.	Kathy Lyons	9 Nelson Avenue Provincetown 026
9.	Richard Baum	140 Bradford St. Provincetown 0265
10.	Tim Richmond	140 Bradford St., Provincetown 026
11.	Thomas D. Hollis	23 Mechanic St. Provincetown, MA 02
12.	Andrew Hames	23 Mechanic St Ptown, MA 026

Petition in Support of Runway 14/32 and in Opposition to Increased Peak Period Pricing

Whereas, Provincetown relies on air service between Boston and Provincetown for (a) service for medical needs: (b) convenient air travel for tourists visiting Provincetown where tourism is the primary industry; and (c) year round transportation for many Provincetown and lower cape residents whose businesses are based in Provincetown with clients and customers located elsewhere in the country or abroad: and

Whereas, proposed runway 14/32 for small aircraft will increase efficiency and safety at Logan Airport without increasing either noise or air pollution over any Boston neighborhoods: and

Whereas, increased peak period pricing will make it economically impossible to continue the Boston/Provincetown route to the detriment of Provinctown's safety and economy,

WE THE UNDERSIGNED, support the development of runway 14/32 and oppose any increase in peak period pricing.

	Name	*Address*
1.	Sharon Barber CFIC	5 Winthrop St, Provincetown
2.	DuAyne Raymond-Prickett	54 Bradford ST STE 1-3 Provincetown
3.	[illegible] Brantigan	11 Johnson St Provincetown
4.	Donald W. Lawrence	7 Winthrop St Provincetown.
5.	JENNIS RHODES	30 WEST VINE P'TOWN
6.	[illegible]	226 A Bradford St
7.	Albert L Baker Jr	15 b Court St Provincetown
8.	Judy Winer	11 Shore RD. Truro, MA
9.	Laurence Murray	234 Commercial St. Provincetown
10.	Theodora Tatos	P.O. Box 186 P-Town 02657
11.	[illegible]	234 Commercial St #3 02657
12.	[illegible]	25 Com. ST P-Town 02657

Petition in Support of Runway 14/32 and in Opposition to Increased Peak Period Pricing

Whereas, Provincetown relies on air service between Boston and Provincetown for (a) service for medical needs: (b) convenient air travel for tourists visiting Provincetown where tourism is the primary industry; and (c) year round transportation for many Provincetown and lower cape residents whose businesses are based in Provincetown with clients and customers located elsewhere in the country or abroad: and
Whereas, proposed runway 14/32 for small aircraft will increase efficiency and safety at Logan Airport without increasing either noise or air pollution over any Boston neighborhoods: and
Whereas, increased peak period pricing will make it economically impossible to continue the Boston/Provincetown route to the detriment of Provinctown's safety and economy,
WE THE UNDERSIGNED, support the development of runway 14/32 and oppose any increase in peak period pricing.

	Name	*Address*
1.	[illegible]	41 Bradford St Provincetown, MA
2.	[illegible]	7 Cook St Provincetown MA
3.	[illegible]	67 Harry Kemp Way Provincetown, MA.
4.	Jack Kelly	87 BRADFORD ST, PROVINCETOWN, MA
5.	[illegible]	POB 350 (Commercial) Provincetown
6.	[illegible]	7 Cook St. Provincetown.
7.		
8.		
9.		
10.		
11.		
12.		

Petition in Support of Runway 14/32 and in Opposition to Increased Peak Period Pricing

Whereas, Provincetown relies on air service between Boston and Provincetown for (a) service for medical needs: (b) convenient air travel for tourists visiting Provincetown where tourism is the primary industry: and (c) year round transportation for many Provincetown and lower cape residents whose businesses are based in Provincetown with clients and customers located elsewhere in the country or abroad: and

Whereas, proposed runway 14/32 for small aircraft will increase efficiency and safety at Logan Airport without increasing either noise or air pollution over any Boston neighborhoods: and

Whereas, increased peak period pricing will make it economically impossible to continue the Boston/Provincetown route to the detriment of Provinctown's safety and economy,

WE THE UNDERSIGNED, support the development of runway 14/32 and oppose any increase in peak period pricing.

	Name	Address
1.	[illegible]	P.O. Box 933 So Wellfleet, MA 02663
2.	Sally Rose	P.O. Box 255 Provincetown, MA
3.	Susan Kenny	180 MAIN ST ANDOVER, MA 01810
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		

Letter 147
Provincetown Business Guild
Gary Reinhart, President

Code	Topic 1	Topic 2	Comment	Response
147.1	General Support		The Provincetown Business Guild supports the construction of proposed Runway 14/32 and strongly urges you to prevent the implementation of peak period pricing at Logan now and at any time in the future.	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.

Provincetown AIDS Support Group
96 Bradford Street
Provincetown, MA 02657
(508) 487-9445

LETTER 148

22 April, 1999

BY OVERNIGHT MAIL

Secretary of Environmental Affairs
Attn. MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 022025

Dear Mr. Pugsley:

148.1

The Provincetown AIDS Support Group wishes to express its support of runway 14/32 and opposition to the establishment of peak period pricing at Logan Airport.

The Provincetown AIDS Support Group has over 260 clients, many of whom depend on Cape Air for fast transportation to Boston Medical services. We oppose peak pricing because it would end year round air service to Provincetown and the region. It is a vital link to Boston providing air service in the case of medical emergencies. There is no substitute service available to our clients.

148.2

The Provincetown AIDS Support Group supports the construction of proposed runway 14/32 and strongly urges you to prevent the implementation of peak period pricing at Logan now and at any time in the future. It is time to permanently shelve this idea that will have such a detrimental effect on the health safety and welfare of the region.

Sincerely yours,

Gary Reinhardt, President
Board of Directors, PASG

cc:. John C. Silva
Manager Environmental Programs
Airports Division, ANE-600
12 New England Executive Park
Burlington, MA 01803

Senator Henri Rauchenbach
State House Room 315
Boston, MA 02133-0154

State Representative Shirley Gomes
State House Room 156
Boston, MA 02133-1056

Hon. William Delahunt
146 Main Street
Hyannis, MA 02601

Letter 148
Provincetown AIDS Support Group
Gary Reinhart, President

Code	Topic 1	Topic 2	Comment	Response
148.1	General Support		The Provincetown AIDS Support Group wishes to express its support of Runway 14/32	Comment noted.
148.2	Alternatives	Peak Period Pricing	We oppose peak pricing because it would end year round air service to Provincetown and the region.	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.

LETTER 149

A·D·S Ventures, Inc.

1540 Monument Street
Concord, MA 01742-5303
Tel 978-369-1920
Fax 978-369-1918
E-mail: ch[illegible]@ix.netcom.com

Jay Wickersham
Director
MEPA Unit
Executive Office of Environmental Affairs
100 Cambridge Street 20th Floor
Boston, MA 02202

April 22, 1999

Jay:

Please find enclosed, several suggestions for Logan mitigation as put forward by *Save Our Heritage.* I have, as we discussed late last month, forwarded a copy of the suggestions onto Chuck Anastas for his information. Please do not hesitate to contact me if you have any questions.

Sincerely,

Chester G. Atkins
Director
ADS Ventures

cc: Chuck Anastas

Mitigation Strategies for Logan as Proposed by *Save Our Heritage* – a community group

The most challenging and pressing issue facing Massport with regards to Logan airport is the issue of noise pollution. Indeed, this is an issue that effects any community in the country that "hosts" an airport. In order to address this issue, Massport should begin the FAR Part 161 process. Under the Airport Noise and Capacity Act of 1990, this is the only formal way an airport operator can legally restrict airport noise. If a FAR Part 161 proposal for Logan were to be accepted by the FAA, this would allow for noise surcharges, limitation on numbers of operations, limitation on the ultimate size of the airport, or special flight procedures. Unfortunately, no airport has ever had a Part 161 proposal accepted by the FAA. In fact, the FAA has made it clear that they do not intend to accept a Part 161 proposal. However, this is really the only binding way to control Logan growth. Through coordinate and combined energy of the community, the state and legislators, there may even be the possibility of establishing breakthrough and instigating change at the national level. 149.1

An Airport noise taskforce under the direction of the Secretary of Environmental Affairs should be created. The mission of the taskforce should be as follows: 149.2

1) Review all current Massachusetts environmental regulations with respect to noise
2) Review the work of other states and countries in the area of airport noise regulation
3) Propose state standards for measurement of noise and noise impact
4) Develop and propose a section in the MEPA regulations related to noise
5) Make recommendations defining the objectives of any Logan FAR Part 161 Process
6) Make recommendations on the content of the noise discussions in the next Logan GEIR

The task force would consist of recognized noise experts from both the public and private sectors who are recognized for their objectivity. Additionally, to gain the support and confidence of the citizens the task force should include community activists.

Massport should work with the state to develop a strategy to move traffic from the air to other forms of transportation and truly build a regional, intermodal system. In particular, the new high-speed rail system offers an excellent opportunity for Massport. Massport could: 149.3

1) Subsidizing and or build parking for rail stations
2) Advertise in support of high speed rail

3) Facilitate access to rail stations through other forms of public transportation
4) Place a surcharge on air operations that offer service to areas serviced by high speed rail. This would encourage the use of rail over the use of air for short haul trips and cut down on the amount of traffic in and out of Logan.

149.4

The Governor should set a timetable of 10 years for a "balanced airport noise trade" with our adjacent states and direct Massport to accomplish this. A study of people who come to Logan from New Hampshire and Rhode Island will show that Logan is still carrying a significant and disproportionate load of out-of-state passengers. A regional program should be developed so that each state is carrying its share of the aviation traffic load. Massachusetts should not be a "net importer" of aviation noise pollution, as it has been for the past 20 plus years. This corresponds to a very real and meaningful shift of the noise burden. Although this could be built into a mitigation plan for Logan and proposed by Massport in the EIR, it would be a great opportunity for the Governor to show that the state understands citizens' concerns and is prepared to demonstrate leadership on this issue.

Massport and the state should support and facilitate the Rt. 3 North construction project. Rt 3 North congestion is the primary barrier to the use the Manchester Airport. New Hampshire has made improvements on its section of Rt. 3. If the Massachusetts section of Rt. 3 were improved and the New Hampshire tolls removed Manchester would become a dependable and preferred option for many travelers. The use of Manchester for commuter flights by Massachusetts's travelers could offset the use of Logan for international and long-range flights by New Hampshire travelers.

149.5

Massport should use whatever legal techniques are available to ensure that quieter aircraft use Logan. If possible, carriers should be discouraged from using Stage 2 aircraft that have been "hushkitted" to Stage 3. These aircraft are much louder than true Stage 3 aircraft. This will be challenging, such "discrimination" is prohibited by Federal regulation. However, there may be creative ways for Massport to "encourage" operators to not use hushkitted aircraft. It is interesting to note that currently the European Union is working to ban the use of hushkitted aircraft in European airports.

149.6

Massport require the publication of the names of users of hushkitted aircraft, other loud aircraft, or late night operations. Additionally, a public monthly report of number of infractions by carrier should be published. These reports should explain the extra noise impact of these operations. This would allow the public to put pressure on the operators. However, Massport is under extreme pressure not to do this by the operators. This is an issue of disclosure, which could fall under the auspices of MEPA, and the Office of

149.7

Environmental Affairs. MEPA and OEA could require that this be done as part of the acceptance of the EIR. In this way, the communities could vent their frustration to the appropriate parities, the worst offenders. This could have a very real effect on the behavior of the operators, and it would also circumnavigate FAA regulations. The communities could focus on the operators instead of on Massport and effect change through market pressure.

Massport, the Governor, and the Secretary of Environmental Affairs should put in a formal request, in the form of an open letter, to the FAA regarding the proposed Stage 4 program for the next generation of quieter aircraft. This letter should explain that communities can no longer accept the noise of airports and the forecasted growth of airports can not go forward without Stage 4 mitigation. A timetable for the development and deployment of Stage 4 aircraft by the airline industry should be demanded. 149.8

Today, local officials are seen as attempting to protect citizens from airport noise. The state, rightly or wrongly, is viewed as a creator of airport noise. The Governor and the Secretary of Environmental affairs need to establish a position of leadership on the issue of protection from noise. This can and should be done through both the EIR process and through unilateral leadership initiatives from the Governor and the Secretary.

Save Our Heritage

A.D.S. VENTURES, INC.

FACSIMILE TRANSMITTAL SHEET

TO: Jay Wickersham	FROM: Chet Atkins
COMPANY: MEPA	DATE: 4/22/99
FAX NUMBER: 617 727 1598	TOTAL NO. OF PAGES INCLUDING COVER:
PHONE NUMBER: 617 727 5830	SENDER'S REFERENCE NUMBER:
RE: Noise Suggestions	YOUR REFERENCE NUMBER:

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:
Please see attached- hard copy to follow

Letter 149
Save our Heritage
c/o ADS Ventures, Inc.
Chester G. Atkins

Code	Topic 1	Topic 2	Comment	Response
149.1	Environmental Review Process	FAA/NEPA	Massport should begin the FAR Part 161 process. Under the Airport Noise and Capacity Act of 1990, this is the only formal way an airport operator can legally restrict airport noise.	Massport prefers to exhaust all available measures on a voluntary basis rather than embark on a FAR Part 161 Study. To date no commercial airport has been able to get FAA approval for a noise rule under the provisions of the regulation.
149.2	Environmental Review Process	MEPA	An Airport noise taskforce under the direction of the Secretary of Environmental Affairs should be created.	There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.

Code	Topic 1	Topic 2	Comment	Response
149.3	Regional Transportation	Passenger Rail	Massport should work with the state to develop a strategy to move traffic from the air to other forms of transportation and truly build a regional, intermodal system. In particular, the new high-speed rail system offers an excellent opportunity for Massport.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.
149.4	Regional Transportation	Regional Airports	The Governor should set a timetable of 10 years for a "balanced airport noise trade" with our adjacent states and direct Massport to accomplish this. A regional program should be developed so that each state is carrying its share of the aviation traffic load. Massachusetts should not be a " net importer" of aviation noise pollution, as it has been for the past 20 plus years.	This is a matter for the United States Congress and individual state legislatures.
149.5	Regional Transportation	Regional Airports	Massport and the state should support and facilitate the Rt. 3 North construction project [because] Rt. 3 North congestion is the primary barrier to the use the Manchester Airport.	Comment noted.
149.6	Noise	Hushkitted Aircraft	Massport should use whatever legal techniques are available to ensure that quieter aircraft use Logan. If possible, carriers should be discouraged from using Stage 2 aircraft that have been "hushkitted" to Stage 3.	Massport commits to begin discussions with the FAA with the goal of instituting restrictions, either locally or nationally, on the use of hushkitted Stage 3 aircraft at Logan Airport.
149.7	Environmental Review Process	MEPA	[MEPA should require] Massport [to publish]... the names of users of hushkitted aircraft, other loud aircraft, or late night operations. Additionally, a public monthly report of number infractions by carrier should be published. These reports should explain the extra noise impact of these operations.	Refer to response to Comment 149.6.
149.8	Noise	Hushkitted Aircraft	Massport, the Governor, and the Secretary of Environmental Affairs should put in a formal request, in the form of an open letter, to the FAA regarding the proposed Stage 4 program for the next generation of quieter aircraft.	Refer to response to Comment 149.6.

LETTER 150

The Seaport Alliance for a Neighborhood Design (SAND)

300 Summer Street Boston MA 02210 617-423-4299

www.bostonseaport.com

April 22, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOEA No. 10458
100 Cambridge St. 20th Floor
Boston, MA 02202

Re: EIS/EIR #10458 — Logan Airside Improvements

Dear Secretary:

The Seaport Alliance for a Neighborhood Design is a community group based in the Fort Point Channel neighborhood of South Boston. Our members, including many Boston-area residents and business owners, have advocated for the planning of a "neighborhood" in the South Boston Seaport District. A chronicle of this effort is documented on our website at www.bostonseaport.com.

We are addressing the Massport EIR for Logan Airside Improvements (#10458) by discussing the long-term impacts of Logan expansion on the South Boston waterfront — an area slated to emerge as a wonderfully vibrant neighborhood over the next 30 years. The South Boston waterfront is geographically the most severely impacted area — a future pedestrian friendly environment now imperiled by the proposed tripling in capacity of Logan Runway 27.

South Boston Seaport District — A Gem in the path of Runway 27 150.1

Surprisingly, economic and environmental impacts on the South Boston Seaport District have not been presented by Massport. This tract of land, roughly 4-5 times larger than Boston's North End, is projected by the Boston Redevelopment Authority's recently published Public Realm Plan to emerge as a dense urban residential and commercial neighborhood over the next 30 years. Outdoor elements of the waterfront plan already under way include harborwalk, harbortrail (bike path), a Fan Pier outdoor skating rink, tidal pool and many harbor-based leisure activities. The Fan Pier buildout alone is projected at $20 billion — much of it made possible by public investment in infrastructure.

Taxpayers have invested $4 billion into Seaport District infrastructure and $4 billion into harbor cleanup, and should expect a long-term return on these investments. A large number of these taxpayers, including all of our members, have dedicated a personal effort in attending hundreds of various meetings with the City of Boston, the BRA, City Council, community leaders, the MBTA, the BTD, landowners, developers, towards achieving a successful master plan for the South Boston waterfront. At none of the hundreds of planning meetings attended by SAND core members — even with Massport, was a mention or consideration of an increase in flights departing from Runway 27. 150.1 (cont.)

Most unfortunately, the South Boston Seaport District is not yet inhabited by the tens of thousands of residents, workers and pedestrians projected in the BRA Master Plan, those most adversely affected by the tripling of capacity of runway 27 to 56,000 departures per year. We at SAND remain vigilant on behalf of our future neighbors.

The Massachusetts Visitors' Bureau and the Massachusetts Convention Center Authority contend that the proposed changes to the airport will aid the South Boston Seaport District by bringing in conventioneers. These cheerleaders for tourists and conventioneers are well-meaning, yet indefensible — the Boston Convention Center occupies a 60 acre parcel out of 800 acres of developable area. The Seaport District of South Boston has never been dedicated to the import and management of tourists, but rather to the service and livelihood of all denizens of the City. Furthermore, the impact of plane flights on the pedestrian environment evolving around the Convention Center (much to the benefit of conventioneers) has not been studied by the MCCA, nor do we expect pedestrian impacts to be provided your office in their comments on this EIS/EIR. 150.2

SAND continues to stress that the success of the South Boston Seaport District will be in its ability to evolve as a mixed-use district for living and working — not as a pedestrian-unfriendly environment with planes roaring 500 - 600 feet overhead. Massport — an agency that has squandered land-banking opportunities within its own Seaport District-based Marine Industrial Park for the sake of short-term revenue generation, is seemingly incognizant of the economic opportunities to benefit Massachusetts over decades to come.

Massport's systematic expansion of Logan Airport

Massport asserts that this proposal will reduce delays caused by wind patterns. Logically, one must ask why delays have been worsening over the past 10-15 years. Here, Massport does not contend that delays have increased as a result of wind patterns. Delays increase because Massport has systematically overburdened its runways. Massport's modus operandi for expansion has been to seek approval at a stated capacity, continue to exceed the capacity to a breaking point and then to state a new objective to alleviate its problems. 150.3

In fact, delays have worsened due to Massport's unwillingness to balance supply and demand for air travel. If passengers were able to fly for free, would Massport be expecting its airports to continue to meet demand?

We would suggest that delays would be reduced, now and in the future, by regulating supply and demand for air travel. Business and leisure travel has increased during the current economic boon and will certainly decrease as the economy stabilizes or if ticket prices are raised during peak periods. 150.4

Massport has not met reasonable Community Obligations

Although Massport is well aware of our community group (based in South Boston's historic Fort Point Channel neighorbood) Massport has not held a single meeting in this area for the benefit of property owners, residents, businesses. The Fort Point Channel neighborhood, home to the Childrens' Museum and New England's highest density population of artists and creative professionals, is the starting point and most significantly impacted neighborhood affected by Runway 27. 150.5

Flights pass over the Fort Point Channel neighborhood along A Street at altitudes of approximately 500-800 feet, yet no decibel or emissions testing has been performed in the Fort Point Channel area. 150.6

Massport's Concerted Campaign of Obfuscation

Massport's EIR and public relations campaign have been devoid of relevant information for the layperson to assess impact.

Massport has portrayed this EIR as

1) a delay reduction program
2) a plan to move air traffic over the harbor with a unidirectional runway
3) an economic necessity for Massachusetts

150.7

None of these portrayals are entirely truthful or substantiated by the EIR/EIS. Considering the potential for increased capacity at Logan with an additional runway (backed by precedent), this plan is much more than a delay reduction program. And considering the major *land-based* shifts in traffic on runways 22L, 22R and 27, the proposal is not a harbor move.

Although we accept that expansion at Logan would have a positive impact on the Massachusetts economy, we do not believe the positive benefit of this particular proposal outweighs its tangible burdens. Despite the vocal chorus of business leaders supporting the runway plan, none have embarked on providing an assessment of the long-term impacts to substantiate their position.

150.8

> We at SAND expect a thorough economic assessment before we accept claims regarding substantial benefit.

As further evidence of Massport's attempt to obfuscate, the agency accepted and used the skewed results of a poll conducted by a business group to demonstrate an "invisible army" of support. In fact, questions offered by the telemarketing firm regarding the Logan proposal were misleading and directed towards supporting the plan.

150.9

> We ask the EOEA to either consider the actual questions asked by these telemarketers, or to discard Massport's use of biased polls and studies.

Finally, it is important to note that Massport worked with Governor Paul Cellucci during the EIS/EIR comment period, to secure Worcester Airport for future expansion. This type of knee-jerk planning is emblematic of Massport's roughshod approach to solving regional transportation issues.

In conclusion, SAND would suggest that Massport EIS/EIR 10458 is short-sighted, permanently retarding the progress of one of Boston's most notable long-term planning accomplishments — the South Boston Seaport District. This urban waterfront will evolve over many decades rather than in one or two business cycles, and the EOEA should join with SAND in appreciation of it — protecting an environment today that generations will enjoy tomorrow.

Best regards,

Steve Hollinger
on behalf of:
The Seaport Alliance for a Neighborhood Design (SAND)

Letter 150
The Seaport Alliance for a Neighborhood Design(SAND)
Steve Hollinger

Code	Topic 1	Topic 2	Comment	Response
150.1	Noise	Impacts	The South Boston waterfront is geographically the most severely impacted area...[T]he tens of thousands of residents, workers and pedestrians projected in the BRA Master Plan[are]...those most adversely affected by the tripling of capacity of Runway 27 to 56,000 departures per year.	Winthrop is actually the most severely affected by high noise exposure levels, now and in the future regardless of which alternative is implemented. However, the Preferred Alternative will provide some noise benefit to Winthrop, as well as to parts of East Boston and Revere that are also exposed to higher noise levels than South Boston.
150.2	Environmental Review Process	Public Process	...[T]he impact of plane flights on the pedestrian environment evolving around the Convention Center (much to the benefit of conventioneers) has not been studied by the MCCA, nor do we expect pedestrian impacts to be provided your office in...[MCCA's] comments on this EIS/EIR.	Comment noted.
150.3	Purpose and Need	Delay	Delays increase because Massport has systematically overburdened its runways. Massport's modus operandi for expansion has been to seek approval at a stated capacity, continue to exceed the capacity to a breaking point and then to state a new objective to alleviate its problems.	Neither Massport nor the FAA has a program to increase passenger demand at Logan Airport. Rather, the objective of both organizations is to accommodate demand safely and efficiently. The recommended Airside Project is intended to enable Logan Airport to accommodate current and future aircraft activity with minimum delay. The construction of Runway 14/32 would significantly reduce delays associated with northwest wind conditions, but would not be expected to induce additional aircraft traffic or passenger activity at Logan Airport. Refer also refer to Section 4.2. The availability of Runway 14/32 is projected to produce a small improvement in air quality from improved efficiency of airfield operations.
150.4	Alternatives	Other Non-Construction Alternatives	We would suggest that delays would be reduced, now and in the future, by regulating supply and demand for air travel.	Federal constitutional provisions, federal aviation statutes and regulations, and contractual provisions related to Federal Airport Improvement Program grants prevent Massport from any control over airline rates, routes, and schedules. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users. Major factors in airline competition are frequency of service and number of markets served, and Massport has no ability to force airlines to consolidate or eliminate flights to influence load factor or aircraft size.

Code	Topic 1	Topic 2	Comment	Response
150.5	Environmental Review Process	Public Process	Massport has not held a single meeting in...[The Fort Point Channel] area for the benefit of property owners, residents, business.	There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.
150.6	Cumulative Impacts	Noise, Air Quality	...no decibel or emissions testing has been performed in the Fort Point Channel area.	Massport has a permanent noise monitor installed in South Boston at B and Bolton Streets not far from Fort Point Channel. It is referred to as Site 2 in numerous tables and in text throughout the document and is used as one of the 23 specific points at which many supplemental noise calculations are made.
150.7	Purpose and Need	Delay	Massport has portrayed this EIR as 1. a delay reduction program 2. a plan to move air traffic over the harbor with a unidirectionaly runway 3 an economic necessity for Massachusetts Considering the potential for increasing capacity at Logan with an additional runway.... this plan is much more than a delay reduction program. And considering the major *land-based* shifts in traffic on runway 22L, 22R and 27, the proposal is not a harbor move.	The Preferred Alternative is a delay reduction program that promotes the efficiency and safety of airfield operations at Logan Airport. Runway 14/32 enhances operating efficiency by providing a third available runway in weather conditions that require northwest-southeast operations. Similar three-runway configurations exist for all other operating directions. Runway 14/32 would not expand the overall capacity of the airport, since Logan Airport's normal operating capacity of 120 operations per hour, which is available approximately 80 percent of the year, is maintained with Runway 14/32. Massport is committed to ensuring that the airfield continues to function as efficiently as possible. The Preferred Alternative achieves this goal responsibly.

Code	Topic 1	Topic 2	Comment	Response
150.8	Environmental Review Process	MEPA	Although we accept that expansion at Logan would have a positive impact on the Massachusetts economy, we do not believe the positive benefit of this particular proposal outweighs its tangible burdens. We at SAND expect a thorough economic assessment before we accept claims regarding substantial benefit.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR documents comply with all applicable NEPA and MEPA requirements. A cost benefit analysis is not required by federal or state law and would not provide appropriate context. Cost information mentioned in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is intended to provide analytic context.
150.9	Environmental Review Process	Public Process	[Massport] accepted and used the skewed results of a poll conducted by a business group to demonstrate an "invisible army" of support...[Q]uestions offered by the telemarketing firm regarding the Logan proposal were misleading and directed toward supporting the plan. We ask the EOEA to either consider the actual questions asked by these telemarketers, or to discard Massport's use of biased polls and studies.	Comment noted.

A Law Office of HOLLAND & KNIGHT LLP

One Beacon Street
Boston, Massachusetts 02108

617-523-2700
FAX 617-523-6850
www.hklaw.com

KENNETH P. BRIER
(617) 573-5872
kbrier@hklaw.com

LETTER 151

April 12, 1999

Secretary of Environmental Affairs
ATTN: NAPA Office
Mr. Arthur Pugsley-EOEA No. 10458
100 Cambridge Street, 20th Floor
Boston, MA 02205

Dear Mr. Secretary:

I would like to add my voice in support of the Logan Modernization project (including runway 14/32). 151.1

As I think a recent article in the *Boston Globe* amply demonstrated, the alternatives to Logan Modernization – including expansion of Hanscom Airport and other regional facilities – either are not viable or will not be sufficient by themselves. While I do not discount the importance of other transportation measures, such as expansion of airports in Worcester, New Bedford, Providence and Manchester and the introduction of a high-speed rail link to New York, I think that the continuation of improvements to Logan Airport is essential to the local economy. In the absence of such improvement, the problem of delays are bound to get worse. This would result in inconvenience to millions of air travelers in the Boston area, as well as the loss of millions of dollars to the local economy and the loss of opportunity for further jobs for the local workforce.

Very truly yours,

SHERBURNE, POWERS,
HOLLAND & KNIGHT

Kenneth P. Brier

Kenneth P. Brier

KPB/dmr

Letter 151
Sherburne, Powers, Holland & Knight Law Offices
Kenneth P. Brier

Code	Topic 1	Topic 2	Comment	Response
151.1	General Support		I would like to add my voice in support of the Logan Modernization project (including runway 14/32)	Comment noted.

SLADE GORTON & CO., INC.
ROCKY BAY FISHING CO.

Finest and Widest Line of Seafood Anywhere"

LETTER 152

April 7, 1999

Mr. Arthur Pugsley EOEA No. 10458
Secretary of Environmental Affairs
MEPA Office
100 Cambridge Street 20th Floor
Boston, MA 02205

Dear Mr. Pugsley,

The Seafood Industry in New England has moved its product dependence from local fishing ports to Logan Airport for both receipt and shipment of fresh seafood. With the decline in fishing resources from local waters, fresh arrives instead from Chile, Iceland, Norway, Canada, etc. Therefore, the Logan Modernization project is critical for the economic well being of our businesses. The additional runway included in this project will allow more air-freight availability in and out of Boston, making importing and exporting of fresh fish quicker and more efficient. 152.1

Another benefit of this modernization is the improvement of the Roadway Interchange System currently being constructed by the Third Harbor Tunnel and the Central Artery projects. Reconfiguring the existing airport exit routes to a two-level roadway system will make the transport of cargo to and from the airport much easier and reduce traffic and congestion.

Of greatest importance to us is that the Logan Modernization project will help us with product availability and will keep Boston as the hub of the U.S. Seafood Industry. Slade Gorton will then be competitive in today's markets and into the 20th century.

If I can provide more information to you please contact me at 617-442-5800.

Sincerely,

Wally Stevens
President

WS/rp

Letter 152
Slade Gorton & Co., Inc.
Wally Stevens, President

Code	Topic 1	Topic 2	Comment	Response
152.1	Alternatives	Runway 14/32	The Logan Modernization project is critical for the economic well being of our businesses. The additional runway included in this project will allow more air-freight availability in and out of Boston, making importing and exporting of fresh fish quicker and more efficient.	Comment noted.

The South Boston Environmental Health Watch
c/o South Boston Public Health Initiative
409 West Broadway
South Boston, MA 02127
Voice 617.464.7664 Fax 617.464.7693

LETTER 153

April 22, 1998

Bob Durand, Secretary
Executive Office of Environmental Affairs, Attention: MEPA Office
Arthur Pugsley, IV EOEA No. 10458
100 Cambridge Street - 20th floor
Boston, Ma 02202

Dear Secretary Durand,

The South Boston Environmental Health Watch is a group of residents that works with the support of the South Boston Health Center's Public Health Initiative to research and address environmental factors that threaten community health. We are particularly concerned with air quality as South Boston residents experience higher than expected rates of chronic obstructive respiratory diseases, cardiovascular disease, and some cancers including lung cancer. All of these diseases are worsened by air pollution.

Consequently, we are troubled by the Logan Airside Improvement Planning Project. Although the report proposes development at Logan to reduce aircraft delays, the premise of the entire report supports growth at Logan.. We are concerned that increased flights at Logan will translate to further degradation of air quality in the communities closest to Logan both from aircraft departures and takeoffs as well as from the associated ground traffic. 153.1

Massport claims that increased air traffic is needed to support local business, industry, and tourism. These needs will be increased as the Convention Center and Seaport District are developed. Our concern is that our community and other urban neighborhoods will bear the consequences of worsening air quality from increased road traffic bringing people and supplies to the Seaport District as well as from increased aircraft activity.

We, therefore, urge you to consider the cumulative effects of all sources of increased air quality degradation to the South Boston and other surrounding communities, already at high risk, that will be most impacted by growth at Logan.

Sincerely

The Undersigned "Francis "Lucky" Devlin" Kristen E. Donahue

Brian R. Mahoney

BRIAN R. MAHONEY

Paul J. Gannon

Nina Lee PA, MPH

Mary Russell, MPH

Linda E. Kalan

LINDA E. DORAN

Francis P. Collins

FRANCIS P. COLLINS

Thomas J Roche

Harvey Fidell

Margaret Healey

Mary Scafidi

Nina Hayes

Laura Connelly

Letter 153
The South Boston Environmental Health Watch

Code	Topic 1	Topic 2	Comment	Response
153.1	Public Health	Effects	We are concerned that increased flights at Logan will translate to further degradation of air quality in the communities closest to Logan both from aircraft departures and takeoff as from the associated ground traffic.	The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative.

LETTER 154

Squantum Community Association
136 Standish Road
Squantum MA 02171

April 7, 1999

State Representative Bruce Ayers
65 Williams Street
No. Quincy MA 02171

Dear Bruce:

The Squantum Community Association has many concerns regarding the proposed additional runway at Logan Airport.

1. The first concern is the Quality of Life in Squantum. Currently we are affected by the noise from the airport. It is, however, at the present time a concern, but due to previous negotiations it is a controlled effect. The evening flight paths do not bring flights over the Squantum area. The possibility of the increase of flights, especially over Squantum will also increase the noise level. 154.1

2. The discharge from the airplanes is a great concern to our residents. As flights increase so will the discharge and the potential for pollutants to fall from the sky. 154.2

3. The flight pattern that will increase any traffic over Moon Island is of serious concern to our residents. The planes will be at an altitude lower than the 1000 feet which is needed in order to maintain safety. A misfired bullet could hit the fuel tank of a low flying plane. Since these planes will have full fuel tanks, a disaster is sure to follow. 154.3

4. Very little has been done to prepare the South Shore and the Squantum Community for the impending runway. We feel that more information needs to be disseminated and more safety issues need to be addressed. 154.4

We look forward to hearing from you regarding all of the above issues.

Sincerely,

Frank Buckley

Frank Buckley
President,
Squantum Community Association.

Letter 154
Squantum Community Association
Frank Buckley, President

Code	Topic 1	Topic 2	Comment	Response
154.1	Noise	Impacts	The possibility of the increase of flights, especially over Squantum will also increase the noise level.	In 1998, 77 percent of Logan Airport's jet traffic affected communities to the north and south of the airport—East Boston, Winthrop, Revere, parts of South Boston, Dorchester, Quincy, Milton, and Braintree. Without Runway 14/32, as much as 88 percent of Logan Airport's aircraft operations will overfly these communities when Logan Airport reaches 37.5 million passengers. Construction of Runway 14/32 will allow a more balanced geographic distribution of aircraft operations over populated areas, will increase the number of over-water operations, and will reduce noise exposure for close-in communities. In fact, the most heavily impacted communities will experience a decrease in overflights compared to 1998 levels. With the Preferred Alternative, when Logan Airport reaches 29 million passengers, overflights from Runway 4 arrivals and Runway 22 departures, which affect South Boston, Quincy, Milton, and Braintree, will decrease from 107,861 in 1998 to 58,305 operations.
154.2	Air Quality	Impacts	As flights increase so will the discharge and the potential for pollutants to fall from the sky.	Although VOC emissions increase over time because of increased aircraft operations activity at Logan Airport, emissions are lower with Alternatives 1 and the Preferred Alternative, when compared to the No Action Alternative. The decreases are attributable to both the proposed Runway 14/32 and the taxiway improvements.
154.3	Alternatives	Runway 14/32	The flight pattern that will increase any traffic over Moon Island is of serious concern to our residents. The planes will be at an altitude lower than the 1000 feet which is needed in order to maintain safety. A misfired bullet could hit the fuel tank of a low flying plane. Since these planes will have full fuel tanks, a disaster is sure to follow.	Runway 14/32 will reduce jet traffic over Moon Island from Runway 22 departures. It will increase the number of arrivals and departures over the harbor (Long Island, Rainsford Island, Gallops Island, Georges Island, etc.

Code	Topic 1	Topic 2	Comment	Response
154.4	Environmental Review Process	Public Process	Very little has been done to prepare the South Shore and the Squantum Community for the impending runway. We feel that more information needs to be disseminated and more safety issues need to be addressed.	There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.

LETTER 155

swissôtel

BOSTON

April 6, 1999

Mr. Arthur Pugsley – EOEA No. 10458
Secretary of Environmental Affairs
Attention MEPA Office
100 Cambridge Street
20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

155.1

I am writing to convey some thoughts regarding the Logan Airport Modernization project and to give our support for the initiative that includes runway 14/32.

Swissôtel Boston is a 500 room deluxe hotel sited in downtown Boston serving the business and leisure communities not just from the United States but from around the world. A majority of our guests arrive by air, hence requiring the smooth operation of a state of the art world class efficient airport. Delays,often leading to cancellations,become a business hazard that need not be.

Our employee base is directly related to our occupancy and occupancy depends greatly on the airport.

Also, I believe that the success of our current convention center and the anticipated success of our future convention center rely heavily on a world class airport.

I hope your agency will do all in its powers to aid the Legislation for this worthy goal.

Sincerely,

David Gibbons
General Manager

Letter 155
Swissotel, Boston
David Gibbons, General Manager

Code	Topic 1	Topic 2	Comment	Response
155.1	General Support		I am writing to convey some thoughts regarding the Logan Airport Modernization project and to give our support for the initiative that includes Runway 14/32	Comment noted.

Tufts Associates
Corporate Benefits Planning

1208 VFW Parkway, Suite 300
Boston, MA 02132
(617) 327-9600
(617) 327-9677 Fax

LETTER 156

April 8, 1999

Mr. Arthur Pugsley
Secretary of Environmental Affairs
MEPA Office
100 Cambrdige Street, 20th flr.
Boston, MA 02205

Dear Mr. Pugsley,

RE: Logan Airport

156.1

I support another runway at Logan which would alleviate the delay problems. As a traveler, I have frequently circled eastern Mass. waiting to land; and as a resident of Milton, I often witness planes circling overhead at very low altitudes.

Commerce in Boston is a very important issue to me as a business person. Instead of using the old-fashioned, Yankee approach to public infrastructure of "patch and make do" with the attitude of "You can't get there from here," or "If you don't know the way, you don't belong here," why not move toward a user-friendly airport while simultaneously supporting regional airports and rail travel.

It's time for action.

Sincerely,

Charles K. Tufts, CLU, ChFC

emg

Letter 156
Tufts Associates
Charles K. Tufts, CLU, ChFC

Code	Topic 1	Topic 2	Comment	Response
156.1	General Support		I support another runway at Logan which would alleviate the delay problems.	Comment noted.

U·S AIRWAYS

LETTER 157

Robert A. Hazel
Vice President
Properties and Facilities

April 8, 1999

Mr. Thomas J. Kinton, Jr.
Director of Aviation
Massachusetts Port Authority
One Harborside Drive, Suite 200S
East Boston, MA 02128-2909

Dear Mr. Kinton:

US Airways, which carries more Boston passengers than any other airline, strongly supports the development of a new 5,000 ft. runway and other airside improvements designed to reduce delays at Logan International Airport.

As you know, for many years, restricted airfield capacity at Logan has resulted in extensive delays for our Boston passengers. Because of the "unbalanced" nature of Logan's current airfield layout, the amount of useable runway capacity changes dramatically depending on the direction of the wind. As a result, not only does Boston rank sixth in delays in the U.S., but the occurrence and severity of those delays are particularly unpredictable.

In order for US Airways and other airlines to provide reliable and affordable air service, it is important that we be able to operate efficiently. Current airfield limitations at Logan do not permit efficient operations. The resulting delays are costly to the airlines and both costly and inconvenient for our passengers. 157.1

As with other major cities, Boston's future economic health will depend in part on having reliable air transportation links to national and international markets. Many other cities, including Atlanta, Miami, Philadelphia, San Francisco, and Seattle, are addressing this challenge by improving runway capacity. To remain competitive, Logan must move forward as well.

Sincerely,

Robert A. Hazel /cgp

Letter 157
US Airways
Robert A. Hazel, Vice President, Properties and Facilities

Code	Topic 1	Topic 2	Comment	Response
157.1	Purpose and Need	Delay	In order for US Airways and other airlines to provide reliable and affordable air service, it is important that we be able to operate efficiently. Current airfield limitations at Logan do not permit efficient operations. The resulting delays are costly to the airlines and both costly and inconvenient for our passengers	Comment noted.

LETTER 158

WINTHROP CHAMBER of COMMERCE

207 Hagman Road
Winthrop, Massachusetts 02152-0005

Telephone: 617-846-9898
Fax: 617-846-9922
Website: *www.winthropchamber.com*
E-mail: *winthropcofc@erols.com*

President
Russ Sanford

Vice President
Golda Zeltsar

Treasurer
James H. Marr, P.P.

Clerk
Jeannie P. Belcher

Board of Directors
Joseph Clark
Phyllis Fluet
Eric Heath
Helen Janielis
Helen Lanagan, P.P.
Belle Liberman
Lincoln McKie
Timothy McNamara
Trudy Montesano
James Polino
Patricia Sullivan

Executive Director
Barbara McNeil

Executive Assistant
Paula Flaherty

April 12, 1999

Statement of the Winthrop Chamber of Commerce Regarding the Logan Airside Improvements Planning Project, Draft Environmental Impact Statement/Report of February, 1999.

The members of the Winthrop Chamber of Commerce recognize the economic value of Logan International Airport to this region. We also recognize the quality of life issues that face the residents of the Winthrop community. The health of the business community in Winthrop hinges on the quality of life present there. This Chamber cannot encourage any expansion that could create additional air or land traffic, additional noise, pollution, additional future operations, and/or other impacts. 158.1

We do in fact recognize the potential economic benefits to other areas of the Commonwealth and will support and encourage the development of regional airports, especially for but not limited to commuter flights. We feel that this would bolster the State's economy and would allow Logan the flexibility it needs to address the needs of both Boston as a world class city, and of Logan's neighboring communities. 158.2

Letter 158
Winthrop Chamber of Commerce

Code	Topic 1	Topic 2	Comment	Response
158.1	General Opposition		This Chamber cannot encourage any expansion that could create additional air or land traffic, additional noise, pollution, additional future operations, and/or other impacts	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates). Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR. No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.
158.2	Regional Transportation	Regional Airports	We...encourage the development of regional airports, especially for but not limited to commuter flights. We feel that this would bolster the State's economy and would allow Logan the flexibility it needs to address the needs of both Boston as a world class city, and of Logan's neighboring communities.	Massport considers Logan Airport to be part of a regional system of airports that includes T.F. Green/Providence, Manchester and Worcester Regional airports. Service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate growth in air travel demand. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a discussion of the roles of Logan Airport and these regional airports in the eastern New England aviation system.

